

11/28/83
153946

November 28, 1983

Mr. Henry L. Schweich
President
Cerro Copper Products
P.O. Box 681
East St. Louis, IL 62202

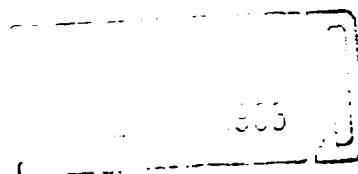
Dear Pop:

As promised, I am sending information which you may find useful in the management of PCB equipment/wastes and oil materials (e.g., gasoline, NO. 2/6, etc.).

The PCB Checklist was developed about 6 months ago and is current as of that time. A quick skim through will show that regulations govern the following aspects of PCB management.

- o Use of equipment (transformers, capacitors, hydraulic equipment, etc.)
 - marking
 - inspections
 - inventorying
- o Storage of PCB wastes
 - marking
 - inspections
 - inventorying
 - storage area standards
 - period of storage
- o Disposal of PCB wastes.

The list of disposal sites and statement of permit activities should also be of use to you. I have also included EPA's recent policy regarding on-site storage periods for PCB wastes. As we discussed, you should take immediate steps to: 1) determine if your PCB wastes meet or exceed 50 ppm; and 2) ship all such wastes off-site as soon as possible to an approved facility.



BY H.L.S.

C01443

The Spill Prevention, Control, and Countermeasure Plan checklist was also drawn up within the last 6 months and should be up to date. As we discussed, you should be cognizant of these regulations if:

- 1) Storage exceeds 1,320 gallons above ground, or
- 2) Storage exceeds 42,000 gallons below ground, or
- 3) Spills to surface waters have occurred, and
- 4) Spills to surface waters could conceivably occur.

These regulations govern design and maintenance of oil material storage and transfer facilities.

Kathy and I had a very relaxing and warm vacation in St. Louis. Thanks so much for the corner to sleep in, the nourishment, the entertainment, and most importantly, the excellent company! Call me with any questions regarding the enclosed information at 703/734-2503.

Best Regards,



Joshua D. Margolis
Waste Management Department

JDM:lsi

TSCA COMPLIANCE PROGRAM POLICY No. 6-PCB-1

Responsibility for Compliance with PCB Rule

*See
Clipped
pages*

TSCA Section: 6(e)

Issue:

If PCB-containing equipment is owned by one party but is used by another party, or is located on the property of someone other than the owner, who is responsible for assuring that such equipment complies with the laws regarding PCBs?

Policy:

In general, the Agency intends to hold the owners of PCB containing equipment responsible for compliance with the PCB Rule [40 CFR Part 761]. However, in all cases involving PCB use by a person who does not own the equipment, or PCB equipment located on property owned by a third party, the Agency will consider the facts of each case to determine whether the user or landowner should be held responsible for compliance, either in addition to, or instead of, the owner of the PCBs.

With one exception, the owner of PCB-containing equipment is responsible for compliance with the Interim Measures Program (46 FR 16090, March 10, 1981). The exception is that a user who is not the owner of a PCB-containing transformer which poses an exposure risk to food or feed products has the obligation to comply with the Interim Measures Program until the user has informed the owner that the transformer poses an exposure risk to food or feed products.

Discussion:

Since the decision of the Court in Environmental Defense Fund v. Environmental Protection Agency (EDF v. EPA), 636 F. 2d 1267 (D.C. Cir. 1980), which invalidated the portion of the Agency's regulations that characterized transformers, capacitors, and electromagnets as totally enclosed, electrical equipment containing PCBs can be used legally only by persons observing the Interim Measures Program. That program, which primarily consists of inspection and maintenance requirements for transformers, appeared in the Federal Register on March 10, 1981 (46 FR 16090). The Court order which established the Interim Measures Program stated that the owner of a PCB-containing transformers has the obligation to comply with the Program, with one exception. A user

who is not the owner of a PCB containing transformer which poses an exposure risk to food or feed products has the obligation to comply with the Interim Measures Program until the user has informed the owner that the transformer poses an exposure risk to food or feed products. Thus, the responsibilities for complying with this program are clear.

The Interim Measures Program is not the only regulatory requirement that must be met for PCB containing equipment. The PCB Rule, 40 CFR Part 761, contains marking and recordkeeping requirements for in-use equipment. Any uncontrolled discharge of PCBs from the equipment may constitute improper disposal. Additionally, leaking equipment is not totally enclosed and thus cannot be used legally.

The PCB Rule does not contain any precise statement concerning who is responsible for these requirements when the owner is not the same person as the user. As a matter of compliance program policy, the Agency intends to hold the owners of PCB-containing equipment responsible for compliance with the PCB Rule. However, in all cases involving PCBs used by a person not the owner, or located on property owned by a person other than the owner of the PCBs, the Agency will consider the facts of each case to determine whether the user or landowner should be held responsible for compliance, either in addition to, or instead of, the owner of the PCB-containing equipment. In determining responsibility for compliance, the Agency will consider, without limitation, the following factors:

- o Written agreements between the parties. Contracts that provide that the user will service the equipment, or that the user agrees to comply with all laws argue in favor of the user's being responsible.
- o Prior actions by the parties. If one of the parties has traditionally serviced the equipment, or taken responsibility for compliance with regulations on the equipment, this will influence the Agency's decision on liability.
- o Access to the equipment. If one party has restricted or no access to the equipment, this argues strongly against that party's responsibility for compliance.
- o Reasonable actions in emergencies. Even where the other factors indicate that the owner is responsible for regulatory compliance, the Agency expects users of PCB containing equipment to act reasonably in the event of a rupture or other environmental emergency. Thus, the failure by a user to notify the owner promptly of any rupture might subject the user to liability under TSCA.

As dictated by the specific instance, the Agency will also consider any other pertinent factors in determining who should be held accountable for compliance with the law. Any person who uses PCB-containing equipment or has such equipment on his property, and is uncertain about his responsibility for compliance is strongly urged to contact the owner of the equipment to reach an agreement on this subject. Such persons should also be reminded that uncontrolled discharges of PCBs may result in exposure of workers or members of the public to PCBs. Such exposure may result in liability under other Federal law (such as the Occupational Safety and Health Act) or State or local law.

This memorandum is only a statement of compliance program policy under TSCA. It is not intended to affect any rights or liabilities any person may have under any other law or by virtue of any contract. It also does not change the Agency's position that persons may not enter into contracts which absolve them of their responsibility or liability for violation of the PCB Rule. (See 44 FR 31538-9, May 31, 1979, for the Agency's position in this regard.)

Key Words:

Responsibility for Compliance
Liability
Penalties
Unlawful Acts
Noncompliance

A. E. Conroy II
A. E. Conroy II, Director
Pesticides and Toxic Substances
Enforcement Division

March 4 1982
Date

TSCA COMPLIANCE PROGRAM POLICY No. 6-PCB-2

Distillation, Solvent Extraction, Filtration,
and other Physical Separation Methods for PCBs

TSCA Section: 6(e)

ISSUE:

Does the physical separation of PCBs from liquids and solids require EPA approval?

POLICY:

The physical separation of PCBs from liquids and solids requires an approval if the use or disposal of these liquids and solids avoids, or is alternative to, the disposal requirements that would have applied to the original material before separation. An approval is required for physical separation activities that can be construed to be part of, or an initiation of a disposal activity. However, an approval is not required for physical separation activities which process PCBs during authorized servicing activities and reuse the processed materials in equipment authorized for continued use in the PCB rules. An approval is also not required for treatment of PCB contaminated water where the treatment medium is properly disposed of and the water is discharged in accordance with a NPDES permit.

DISCUSSION:

The PCB regulations (40 CFR 761.60, 44 FR 31514) require EPA approval of activities which dispose of PCBs and PCB Items. In 1979, a company approached EPA for a policy on the use of filters for physically removing PCBs from transformers. At that time, EPA interpreted "disposal" to mean only activities which alter or destroy PCB molecules, while activities which physically separate or concentrate PCBs from liquids or solids were judged not to constitute "disposal" and not, therefore, to require an approval. Examples of techniques which physically separate PCBs from liquids and solids include filtration, distillation, and solvent extraction.

In 1982, after some experience with this policy, EPA realized that the application of the above approach to physical separation methods had the potential to create a major avenue for avoiding the PCB disposal requirements. The PCB rules require specific disposal options for materials containing PCBs. Unapproved alternatives to these disposal requirements have the potential to circumvent the rules and pose unnecessary risks.

EPA reviewed its interpretation of the PCB regulations regarding physical separation and found that the original PCB rules do not exempt PCB processing activities (including

While activities which process or distribute PCBs for purposes of disposal are not subject to processing and distribution in commerce bans, such activities are subject to disposal regulations. Section 761.20(c)(2) [emphasis added] provides: "PCBs or PCB Items may be processed and distributed in commerce in compliance with the requirements of this Part for purposes of disposal in accordance with requirements of §761.60 [PCB disposal requirements]."

Accordingly, unless an activity is authorized by the disposal regulations, one must obtain specific approval for the activities from the Regional Administrator or the Assistant Administrator for Pesticides and Toxic Substances in accordance with section 761.60(e)(1982). Note, however, that it is not the intention of this policy to require approval of physical separation activities regarding the clean-up of leaks and spills of PCBs or to require approval of inadvertent separations due to natural forces (such as evaporation and gravity) that are not construed to be part of a disposal activity. It is also not the intention of this policy to require approval of physical separation activities that are part of manufacturing processes that incidentally manufacture PCBs. The physical separation of PCBs from products and waste streams in manufacturing processes will be considered during the upcoming rulemaking on the applicability of a regulatory cutoff for the manufacture of PCBs ("the uncontrolled rule").

The following example of the use of a physical separation technique is applicable. Capacitors must be disposed of by incineration or by an approved alternate method equivalent to incineration (40 CFR 761.70). It is theoretically possible to develop a capacitor disposal method the first step of which is to separate the PCBs from the solid materials (e.g., solvent extraction). The separation process, requires specific prior approval by the Regional Administrator or Assistant Administrator for Pesticides and Toxic Substances under section 761.60(e) since it is part of the disposal method but is not authorized under section 761.60. If such a method were successful in completely removing all detectable PCBs from the solids, the PCB-free solid materials could later be salvaged without subsequent treatment or EPA approval. Although the PCBs removed from the solid materials and any unprocessed materials require incineration, it is also theoretically possible to obtain approval to use a physical separation technique to remove PCBs from the liquid materials in a similar manner.

In contrast, a permit is not required to service electrical equipment for purposes of reducing PCB concentrations. Physical separation techniques can be used to service PCB-containing electrical equipment as long as the processed materials are ultimately returned to electrical equipment regulated under the PCB rule. This type of servicing is authorized under 40 CFR

761.30(a). Filtering PCBs from the dielectric fluid of transformers and returning that fluid to the transformer is an example of this type of activity. Because the processed liquids and solids are returned or reused in regulated equipment, EPA controls the ultimate disposition of all the processed materials and no disposal requirements are circumvented.

Without an EPA disposal approval, processed liquids and solids that formerly contained PCBs must be treated as if they still contain PCBs and may not be distributed in commerce without an exemption under section 6(e)(3)(B) of the Toxic Substances Control Act (TSCA). Therefore, it is possible to physically separate PCBs from liquids and solids without EPA approval as long as these liquids and solids are treated (used, stored, disposed of, etc) as if they still contain their original PCB concentration. The PCB residue which results from physical separation activities, as well as any materials not eventually reused in regulated electrical equipment, must be disposed of in a manner which complies with section 761.60. In the event the separation method results in dilution of the PCBs, the original PCB concentration determines the required disposal method.

A permit is not required to physically separate an organic phase from an aqueous phase of collected water (e.g. leachate, lagoon water, storm water). The organic phase must be disposed of according to the regulations for its concentration of PCBs. The aqueous phase may be disposed of by means of filtration to remove any residual PCBs (e.g. activated carbon) provided the filter medium is disposed of in accordance with the regulations for solids containing that concentration of PCBs, and the water, if discharged to navigable waters, is discharged in accordance with a National Pollutant Discharge Elimination System (NPDES) permit granted under the Clean Water Act. Water cannot legally be discharged from a point source without meeting the permit conditions. Through this permitting process, EPA limits the amount of PCBs in the water prior to discharge. Since EPA controls the amount of PCBs released with the water, and also controls the disposal of any PCBs physically separated from the water (40 CFR 761.60), no additional approval under TSCA is necessary or warranted. This form of physical separation may be compared to the policy of not requiring approvals for physical separation methods which result in all materials going to controlled equipment or proper disposal under the PCB regulations.

Section 761.30 authorizes servicing of electrical equipment for purposes of reducing PCB concentrations. After such servicing, this electrical equipment may be reclassified if, after at least 3 months of in-service use, the PCB concentration is reduced below the appropriate level.

See Also:

TSCA Compliance Program Policy No. 6-PCB-3

References:

Letter to SED, Inc dated April 2, 1981

Letter to Amtrak dated July 20, 1982

Key Word Headings:

Physical Separation, Disposal



A. E. Conroy II, Director
Compliance Monitoring Staff
Office of Pesticides
and Toxic Substances

Date: 8-16-83

TSCA COMPLIANCE PROGRAM POLICY No. 6-PCB-3

Residual PCBs in Processed Liquids and Solids

TSCA Section: 6(e)

ISSUE:

Are PCBs at concentrations less than 50 ppm in liquids and solids that have been physically separated from higher concentration PCB materials regulated for the purpose of disposal?

POLICY:

PCBs at concentrations less than 50 ppm in liquids and solids that have been physically separated from higher concentration PCB materials are regulated as if they still contain the original PCB concentrations.

DISCUSSION:

Section 40 CFR 761.1 states that a substance containing less than 50 ppm PCBs because of any dilution shall be treated for disposal purposes as though it contains its original PCB concentration. This means that diluted PCBs would be subject to EPA disposal regulations under 40 CFR 761.60, even though other substances in concentrations less than 50 ppm are not. Accordingly, if a PCB concentration under 50 ppm resulted from an activity in which PCBs originally in concentrations above 50 ppm were physically separated from other material, any separated PCBs would be subject to EPA disposal regulations under 40 CFR 761.60. This includes those PCBs contained in a fraction with a concentration less than 50 ppm (e.g. the "light" fraction from a distillation process.)

A separator who is servicing electrical equipment may dispose of the "heavy" PCB fraction according to 40 CFR 761.60 and return the "light" fraction to the electrical equipment, in which case all materials are controlled by the PCB regulation. In the alternative (if he intends to produce a light fraction which will not be disposed of according to the PCB rule or reused in electrical equipment), the separator must obtain a disposal approval from either the Assistant Administrator for Pesticides and Toxic Substances or a Regional Administrator under 40 CFR 761.60(e). Only after the light fraction has been shown to contain no detectable PCBs, however, can the activity be approved by EPA as a disposal activity and considered an unregulated material.

It has been suggested that the disposal regulations either do not or should not apply to the light fraction unless the dilution process was intentionally done to circumvent the EPA disposal regulations. This interpretation is not correct. Section 761.1

does not permit any dilution of PCBs to affect the applicability of the PCB rules, unless the dilution is specifically provided for in the regulation. The regulation also does not provide for inquiry into the intent of the person performing the separation.

See Also:

TSCA Compliance Program Policy No. 6-PCB-2


References:

Letter to SED, Inc. dated April 2, 1981

Letter to Amtrak dated July 20, 1982

Key Word Headings:

Physical Separation, Disposal


A. E. Conroy II, Director
Compliance Monitoring Staff
Office of Pesticides and
Toxic Substances

Date: 8-16-83

TSCA COMPLIANCE PROGRAM POLICY No. 6-PCB-6

Allocation of Enforcement Liability for Violations of the One-Year Disposal Deadline for PCB Articles or PCB Containers

TSCA Section: 6(e)

Issue:

How does EPA allocate enforcement liability among persons who violate the requirement that PCB articles and PCB containers be disposed of within one-year after being placed into storage.

Policy:

EPA will allocate enforcement liability for a failure to dispose of PCB waste within one year after it is placed into storage between the generator and the ultimate disposal facility based on the contribution by either party to the violation. A generator delivering PCB waste to a disposal facility later than 90 days before the end of the one-year disposal deadline will be held liable if the disposal facility can not dispose of the waste in time. A disposal facility receiving PCB waste later than 90 days before the end of the one-year deadline will not be held liable if the PCB waste is disposed of within 90 days.

Discussion:

Section 40 CFR 761.65(a) limits storage of PCBs designated for disposal to one year. This requirement also states that "any PCB Article or PCB Container stored for disposal before January 1, 1983, shall be removed from storage and disposed of...before January 1, 1984. Any PCB Article or PCB Container stored for disposal after January 1, 1983, shall be removed from storage and disposed of...within one year from the date it was first placed into storage."

The one-year time limit is intended to insure prompt disposal of PCBs removed from service. However, the requirement does not preclude some waste generators or intermediate waste handlers from storing the waste for long periods of time (up to 12 months) before releasing it for ultimate disposal. As a result, facilities which receive the waste for ultimate disposal may not have sufficient time to dispose of the waste within the one-year time limit.

EPA will allow facilities receiving waste a year after being placed into storage by the generator an additional 90 days after receipt to dispose of the wastes without incurring enforcement liability. Because representatives of the two approved, landbased commercial incinerators have provided technical data showing that PCB waste is disposed of within 90 days after receipt by the facility, EPA

has determined that ninety days is sufficient lead-time for the disposer to receive and dispose of PCB waste. Therefore, if a generator delivers waste to a disposal facility with ninety days or more remaining in the one-year deadline, the disposer is responsible for destroying the material before the deadline. The liability shifts to the generator if the material is delivered to the disposal facility with less than ninety days remaining in the one-year allowed for disposal after storage. The disposer, however, will share in the liability if he does not dispose of the waste within ninety days from the date it is received at the disposal facility.

EPA will utilize the scale below to allocate liability between the generator and disposer.


	<u>WHEN DELIVERED TO DISPOSER</u>	<u>WHEN DISPOSED</u>	<u>LIABILITY</u>	
			<u>GENERATOR</u>	<u>DISPOSER</u>
I	more than 90 days before 1 yr. deadline	after 1 yr. deadline	none	entire penalty
II	90 days before 1 yr.	within 1 yr.	none	none
III	60 days before 1 yr.	1 mo. late	1/3 penalty	none
IV	30 days before 1 yr.	60 days late	2/3 penalty	none
V	last day	3 mos. late	entire penalty	none
VI	after 1 yr.	within 90 days of receipt	entire penalty	none
VII	after 1 yr.	after 90 days of receipt	entire penalty	entire penalty

See Also: TSCA Compliance Program Policy 6-PCB-7.

References:

Key Words:

PCBs, ultimate disposal facility, disposal deadline.


A. E. Conroy II, Director
Compliance Monitoring Staff
Office of Pesticides and Toxic Substances

TSCA COMPLIANCE PROGRAM POLICY No. 6-PCB-7

Reference Date for Violations of the One-Year Storage for Disposal
Deadline for PCB Waste Resulting From Physical Separation.

TSCA Section: 6(e)

Issue:

What date will EPA use as a reference date for violations of the one-year storage for disposal deadline for PCB waste resulting from physical separation?

Policy:

The one-year storage limit on PCBs resulting from physical separation begins on the date the original PCB articles or PCB containers were placed into storage for disposal. Drums or bins containing PCBs resulting from physical separation shall be required to be marked with the date corresponding to the earliest dated PCB material in the drum.

Discussion:

The PCB Storage for disposal requirements (40 CFR 761.65) prescribe that any PCB article or PCB container "shall be removed from storage and disposed of ... within one year from the date it was first placed into storage." This provision is intended to prevent long-term storage of PCB materials. To help insure prompt disposal, incoming PCB articles and containers are required to be dated when they arrive at the storage facility (40 CFR 761.65).

Some disposal firms, particularly metal recovery and salvage operations, physically separate the PCB-contaminated core from the article or container, recycle the metal portion after rinsing, and store the remaining PCB portion in drums for disposal by incineration or other treatment. The drums may contain PCB wastes that result from physically separated articles or containers that were placed into storage on different dates. There is some confusion among physical separators regarding the correct date to apply to these drums.

A similar problem arises at incineration facilities which shred PCB articles and other solid materials and place these shredded parts in drums before feeding them to the incinerator. Components of many PCB articles may be placed in the same drum.

EPA has never articulated a policy regarding the storage for disposal requirements and how they apply to PCB waste that results from physical separation. However, the Agency has developed a policy on disposal of PCBs that have been physically separated from regulated liquids and solids. This policy has direct bearing on the storage for disposal requirements.

EPA's position is that PCBs at concentrations less than 50 ppm in liquids and solids that have been physically separated from higher concentration PCB materials are regulated as if they still reflect the original PCB concentrations. Operations such as distillation and solvent extraction have the effect of diluting the PCB concentration in the original material. Section 40 CFR 761.1 states that a substance containing less than 50 ppm PCBs because of any dilution shall be treated for disposal purposes as though it contains the original PCB concentrations. This means that diluted PCBs would be subject to EPA disposal regulations (40 CFR 761.60), as well as the storage for disposal requirements (40 CFR 761.65). PCB Articles have specific disposal requirements (40 CFR 761.60) and all parts of the article are controlled by the rule.

The date used as the starting date for the one year storage disposal deadline on a PCB article or PCB container prior to physical separation shall be the earliest date of the PCB items in a container. Such PCB items must be disposed of within one-year from the earliest dated item.

See Also: TSCA Compliance Program Policy 6-CFC-6.

References:

Key Words:

PCB, physical separation.

A. E. Conroy II

A. E. Conroy II, Director
Compliance Monitoring Staff
Office of Pesticides and Toxic Substances

Aug 16-83
Date

Spill Prevention Control and Countermeasure Plan Requirement Checklist - 40
CFR Part 112.1 Through 112.7 of the Federal Water Pollution Control Act

Applicability

- ___ Non-transportation-related on-shore and off-shore facilities engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, or consuming oil and oil products and, which due to their location, could reasonably be expected to discharge oil in harmful quantities into or upon navigable waters or adjoining shorelines - 112.1(b)

Exemptions

- ___ On-shore and off-shore facilities, which due to their location, could not reasonably be expected to discharge oil into or upon navigable waters (excludes manmade facilities isolated by manmade structures such as dikes, berms, etc.) and - 112.1(d)(1)(i)
- ___ Equipment, operations, or facilities subject to DOT control as defined in Memorandum of Understanding dated 11/24/71 - 112.1(d)(1)(ii)
- ___ Have underground buried storage of less than 42,000 gallons, and - 112.1(d)(2)(i)
- ___ Have aboveground storage of less than 1,320 gallons, and no single container exceeding 660 gallons - 112.1(d)(2)(ii)

Effective Dates and Requirements

- ___ SPCC plan must be prepared within 6 months after beginning of operations - 112.3(b)
- ___ SPCC plan must be implemented within 1 year after beginning of operations - 112.3(b)
- ___ SPCC plan may be adapted to new location should a facility move after SPCC plan preparation - 112.3(c)
- ___ SPCC plan must be reviewed and certified by a Registered Professional Engineer - 112.3(d)
- ___ SPCC plan must be maintained on-site if the facility is normally attended at least 8 hours per day, or at the nearest field office if the facility is not attended - 112.3(e)

Extension of Time

- ___ Time extensions may be granted by the Regional Administrator where delay is caused by non-availability of qualified personnel or delays in construction or equipment delivery - 112.3(f)(i)

___ To receive time extension, owner or operator must send letter to the Regional Administrator providing background information - 122.3(f)(2)

Amendment of SPCC Plan and Reporting of Spills

- ___ Spill events must be reported to the Regional Administrator when:
 - ___ More than 1,000 gallons of oil in a single event are discharged into navigable waters, or
 - ___ Two or more spill events reportable under Section 311(b)(5) of the FWPCA) within any 12 month period - 112.4(a)
- ___ Spill reports must contain amendments, corrective actions, and results of spills - 112.4(a)(1 through 11)
- ___ Facilities should follow 112.4(c through f) procedures for responding to Regional Administrator's comments on SPCC amendments
- ___ Amendments must be filed by facilities whenever there is a change in
 - ___ Facility design
 - ___ Construction
 - ___ Operation or maintenanceAmendments must be implemented within 6 months of change - 112.5(a)
- ___ Review of SPCC plan must be conducted once every 3 years; amendments must be incorporated within 6 months to include more effective prevention and control technology - 112.5(b)
- ___ All amendments must be certified by a certified Professional Engineer - 112.5(c)

Penalties

- ___ \$5,000 per day for failure to comply with 112.3 through 112.5 requirements

Elements That Should be Included in SPCC Plan

Past Spill Events

- ___ Describe spill events, corrective actions, and prevention plans - 112.7(a)

Potential Spills

- ___ Where there is spill potential, predict rate and direction of flow, and quantity of oil expected to be discharged with each type of failure - 112.7(b)

Containment Structures

- ___ Containment and/or diversionary structures should be provided to prevent discharged oil from reaching navigable waters. Such structures may include (for on-shore facilities):

- ___ Dikes, berms, retaining walls (impervious)
- ___ Curbing
- ___ Culverting, gutters, or other drainage systems
- ___ Weirs, booms, or other barriers
- ___ Spill diversion ponds
- ___ Retention ponds
- ___ Sorbent materials - 112.7(c)(1)(i through vii)

- ___ Where 112.7(c)(1) structures are impractical, demonstrate and provide alternative SPCC plan - 112.7(d)

Facility Drainage

- ___ Drainage from diked storage areas should be restrained by valves or other means to prevent spill or excessive leakage into the drainage system or in-plant effluent treatment system except where plan systems are designed to handle such leakage - 112.7(e)(1)(i)
- ___ Drainage pumps should be manually activated and accumulations should be checked to ensure no contamination with oil - 112.7(e)(1)(i)
- ___ Drain valves should be of manual, open and closed design (as far as practical) - 112.7(e)(1)(ii)
- ___ Retained stormwater should be inspected prior to discharge directly into water courses - 112.7(e)(1)(ii)
- ___ Plant drainage system from undiked areas should flow into lagoons or catchment basins not located in areas subject to flooding - 112.7(e)(1)(iii)
- ___ Plant drainage systems that cannot be designed as in 112.7(e)(1)(iii) should engineer diversion systems that can be used to return spilled oil to the plant - 112.7(e)(1)(iv)
- ___ Drainage waters treated in more than treatment unit should use natural hydraulic flow. Where pump transfer is needed, two "lift" pumps should be used (one of which should be permanently installed when treatment is continuous) - 112.7(e)(1)(v)

Bulk Storage Facilities

- ___ Storage tank material and construction should be compatible with material stored - 112.7(e)(2)(i)
- ___ Bulk storage tank installations should have a secondary means of containment with a sufficient capacity to hold the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation - 112.7(e)(2)(ii)
- ___ Containment structures should be sufficiently impervious to contain spilled oil - 112.7(e)(2)(ii)

- ___ Drainage of rainwater from the diked area may be discharged into a storm drain or effluent discharge (into navigable water) if:
 - ___ Bypass valve is normally closed
 - ___ Run-off is inspected
 - ___ Bypass valve is opened, and resealed under supervision
 - ___ Adequate records are kept of such events - 112.7(e)(2)(iii) (a through d)
- ___ New buried metallic tanks should be protected from corrosion by coatings, cathodic protection or other methods compatible with local soil conditions - 112.7(e)(2)(iv)
- ___ New buried tanks should be subjected to regular pressure testing - 112.7(e)(2)(iv)
- ___ The buried portion of partially buried metallic tanks should be adequately coated - 112.7(e)(2)(v)
- ___ Aboveground tanks, tank supports, and foundations should be subject to periodic integrity testing and the outside should be frequently observed to detect leaks - 112.7(e)(2)(vi)
- ___ Leakage from heating coils should be controlled through:
 - ___ Monitoring steam return or exhaust lines for contamination when discharged into an open water course, or
 - ___ Installing an external heating system - 112.7(e)(2)(vii)-(a and b)
- ___ New and old tanks should be fail safe engineered with one or more of the following devices:
 - ___ High liquid level alarms with an audible or visual signal
 - ___ High liquid level pump cut-off devices
 - ___ Direct audible or code signal communication between tank gauge and pumping station
 - ___ Fast response liquid level determination system
- ___ Liquid level sensing devices should be tested regularly - 112.7(e)(2)(viii)(a through e)
- ___ Plant effluents discharged into navigable waters should have disposal facilities observed frequently enough to detect possible upsets - 112.7(e)(2)(ix)
- ___ Visible leaks should be promptly corrected - 112.7(e)(2)(x)
- ___ Mobile/portable tanks should be positioned to prevent spilled oil from reaching navigable waters and located away from flood areas - 112.7(e)(2)(xi)

Facility Transfer Operations, Pumping, and In-Plant Process

- ___ Buried piping should have a protective wrapping or coating and be cathodically protected if soil conditions warrant - 112.7(e)(3)(i)
- ___ Buried piping should be inspected if uncovered - 112.7(e)(3)(i)
- ___ Pipelines not in service or in standby service should have terminals capped or blank-flanged and marked as to origin - 112.7(e)(3)(ii)
- ___ Pipe supports should be designed to minimize abrasion and corrosion - 112.7(e)(3)(iii)
- ___ Aboveground valves and pipelines should be regularly examined to determine general conditions. Periodic pressure testing should be used where facility drainage failures may lead to a spill event - 112.7(e)(3)(iv)
- ___ Vehicular traffic should be warned so as to not endanger aboveground piping - 112.7(e)(3)(v)

Facility Tank Car and Tank Truck Loading/Unloading Rack

- ___ Loading/unloading areas should meet DOT regulations - 112.7(e)(4)(i)
- ___ Rack area drainage should flow into a catchment basin, treatment facility, or a quick drainage system - 112.7(e)(4)(ii)
- ___ Lowermost drain and all outlets of vehicles should be examined for leakage and tightened/adjusted prior to filling and departure and during transit - 112.7(e)(4)(iv)

Inspections and Records

- ___ Written inspection procedures should be developed; procedures should be signed by the supervisor or inspector, should be made part of the plan, and should be maintained for a period of 3 years - 112.7(e)(8)

Security

- ___ Security measures should include:
 - ___ Full fencing around plant
 - ___ Locked and/or guarded entrance gates when plant is not in productions - 112.7(e)(9)(i)
- ___ Master flow and drain valves and any other valves that will permit outward flow of tank contents should be securely locked in the closed position when in non-operating or non-standby status

-112.7(e)(9)(ii)

- ___ Starter control on all oil pumps should be:
 - ___ Locked in the "off" position, or
 - ___ Located at a site only accessible to authorized personnel when in non-operating or standby status - 112.7(e)(9)(iv)
- ___ Loading/unloading connections of oil pipelines should be securely capped or blank-flanged when not in service for an extended period of time - 112.7(e)(9)(iv)
- ___ Facility lighting should be appropriate for the type and location of the facility and be designed to:
 - ___ Assist in the discovery of spills during darkness hours
 - ___ Prevent spills due to vandalism - 112.7(e)(9)(v)

Personnel Training

- ___ Personnel should be trained to:
 - ___ Operate and maintain equipment to prevent oil discharges
 - ___ Understand applicable laws and regulations - 112.7(e)(10)(i)
- ___ Facility should have designated person responsible for spill prevention and reporting to management - 112.7(e)(10)(ii)
- ___ Facility should schedule spill prevention briefings at intervals frequent enough to ensure adequate understanding of the SPCC Plan - 112.7(e)(10)(iii)
- ___ Spill prevention briefings should highlight and describe known spill events or failures, malfunctioning components, and amendments to the SPCC plan - 112.7(e)(10)(iii)

June 13, 1983

COMMERCIAL LANDFILLS APPROVED FOR PCB DISPOSAL

Section 6(e) requires EPA to control the manufacturing, processing, distribution in commerce and use of polychlorinated biphenyls (PCBs). Under the PCB rule, disposal of many PCBs, as defined in the rule, is prohibited, except at EPA approved facilities. Liquid PCBs in concentrations above 500 ppm may not be landfilled. The landfill information listed below was recently supplied to EPA by the named companies. EPA does not accept responsibility for the accuracy of the information. For the latest information on these facilities, call the EPA regional contacts given below.

STATE	CORPORATE INFORMATION	EPA CONTACT	<ul style="list-style-type: none">. Drained transformers & containers. Contaminated soil, dirt, rags and other debris. Dredge soil and municipal sludges. Contaminated asphalt	
			Liquid PCBs 50-500 ppm	
Alabama	(Site Location) Chemical Waste Mgmt. Alabama Inc. Box 55 Emelle, AL 35459 (205) 652-9531 (Sales Office) Chemical Waste Mgmt. Marietta, GA 30061 Box 3065 (404) 952-0444 ATTN: Al McCoy	Ralph Jennings (404) 257-3864	X	X
California	(Site Location) Casmalia Resources Casma NTU Rd. Casmalia, CA (805) 937-8449 (Site mailing address) Box E, Casmalia, CA 93429 (Corporate Headquarters) Casmalia Resources 559 San Ysidro Rd.), Santa Barbara, CA 93108 (805) 969-5897 ATTN: Jim McBride	Raymond Seid (415) 974-8389	X	

STATE	CORPORATE INFORMATION	EPA CONTACT	. Drained transformers & containers . Contaminated soil, dirt, rags and other debris . Dredge soil and municipal sludges . Contaminated asphalt	Liquid PCBs 50-500 ppm
California	(Site Location) Chemical Waste Mgmt., Inc. Box 157, Kettleman City, CA 93239 (209) 386-9711 (Sales Office) Box 1104 Coalinga, CA-93210 (209) 386-9711 ATTN: Craig McKenzie/ Mark Langowski	Raymond Seid (415) 974-8389	X	
Idaho	Envirosafe Services, Inc. of Idaho Box 936, Mt. Home, ID 83647 (208) 587-8434 ATTN: Dave Ralston	Roger Fuentes (206) 442-1254	X	X
Nevada	(Site Location) U.S. Ecology Inc. Box 578 Beatty, NV 89003 (702) 553-2203 ATTN: Steve Carpenter (Corporate Headquarters) U.S. Ecology Inc. 9200 Shelbyville Rd. Louisville, KY 40222 (502) 426-7160/800-626-5317 ATTN: Jackie Dickenson	Raymond Seid (415) 974-8389	X	

STATE	CORPORATE INFORMATION	EPA CONTACT	. Drained transformers & containers . Contaminated soil, dirt, rags and other debris . Dredge soil and municipal sludges . Contaminated asphalt	Liquid PCBs 50-500 ppm
New York	(Site Location) CECOS International 56th St. & Niagara Falls Blvd. (716) 282-2676 (Corporate Headquarters) CECOS International Box 619 Niagara Falls N.Y. 14302 (716) 873-4200 ATTN: Customer Services	John Brogard (212) 264-2637	X	
New York	(Site Location) SCA Chemical Services Box 200 Model City N.Y. 14107 (716) 754-8231 ATTN: Customer Service	John Brogard (212) 264-2637	X	X
Ohio	(Site Location) CECOS International 5092 Aber Road Williamsburg, Ohio (513) 720-6114 CECOS International 4879 Spring Grove Ave. Cincinnati, OH 45232 (513) 681-5731 ATTN: Customer Services	Y.J. Kim (312) 353-1428 and W.E. Muno (312) 886-6136	X	

STATE	CORPORATE INFORMATION	EPA CONTACT	. Drained transformers & containers . Contaminated soil, dirt, rags and other debris . Dredge soil and municipal sludges . Contaminated asphalt	Liquid PCBs 50-500 ppm
-------	--------------------------	----------------	---	---------------------------

Oregon	(Site Location) Chem-Security Systems, Inc. Star Route Arlington, OR 98712 (503) 454-2777 ATTN: Denis Sapiro (Corporate Headquarters) Chem-Nuclear Systems, Inc. Box 1866 Bellevue, WA 98009 (206) 827-0711 ATTN: Roger Nelson/Alex Cook	Roger Fuentes (206) 442-1254	X	X
--------	---	---------------------------------	---	---

March 31, 1983

Office of Pesticides and
Toxic Substances

Volume 9

Introduction

This is the ninth of a series of reports designed to inform responsible Headquarters, Laboratory and Regional Office personnel of PCB-related activities in U.S. EPA Regions I - V. Together with a companion report for Regions VI - X, it will serve to update the current status of all regional actions related to implementation of the PCB regulations (40 CFR 761).

Permit Activities

The current status of all thermal and nonthermal PCB destruction activities in Regions I through V are reported in Tables 1 - 5. The companion newsletter reports these activities for Regions VI-X in Tables 6-10. Table 11, which is common to both newsletters, presents the principal PCB and toxic waste contacts in each region, as well as the prime technical assistance contacts for PCB-related assistance. A narrative of the updated data obtained from Regional office contacts for Regions I-V is provided in Appendix A.

TABLE 1. INFORMATION ON PCB ACTIVITIES - REGION I

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and Nonthermal Destruction</u>							
Public Service Company of New Hampshire	02/06/80	Herrimac Station, NH	PCB contaminated mineral oil	Thermal	High efficiency utility boiler	No test burn scheduled	Approved 3/3/80.
New England Power Company	10/14/80	Salem Harbor Station, MA	PCB contaminated mineral oil	Thermal	High efficiency utility boiler	No test burn scheduled	Approved 12-80. Not interested in pursuing an actual burn at this time.
General Electric	Spring 1980	Pittsfield, MA	PCB contaminated mineral oil	Thermal	Liquid injection incinerator	Test burn conducted 11/30/81	Approved to burn fluids with 500 ppm on 8/19/80; November 1981 test utilized oil with 20X PCBs. Approved as an Annex 1 incinerator March 4, 1982.
Northeast Utilities	06/19/80	Middletown Station, Middletown, CT	PCB contaminated mineral oil	Thermal	High efficiency utility boiler	Test burn conducted 09/81	Approved 09/04/80.
Massachusetts Institute of Technology	-	-	-	-	-	-	Informal inquiry made to EPA office, No further action taken.
New Bedford Municipal Sludge Incinerator	-	New Bedford, MA	Municipal/Industrial Sludge containing PCBs	Thermal	Multiple hearth incinerator	-	PCB destruction efficiency testing has been postponed indefinitely due to equipment funding problems.
ACUREX	January 1981 11-15-82	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	Demonstrated nationally 09/09/81	Approved, February 1, 1982, for mineral oil dielectric fluids only. No limit on maximum allowable PCB concentration. Request received in Nov. 1982 to modify approval to accommodate a design change in the system.
SUNOHIO	March 1981	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	Demonstrated nationally 10/24/80	Approved June 1981 for mineral oil dielectric fluids only. No limit on maximum allowable PCB concentration.
Pyro-Magnetics	December 1981	Mobile	PCB contaminated waste oil	Thermal	Incineration	-	Test burn results received May 11, 1982. Letter issued July 9, 1982 qualifying unit as an Annex 1 incinerator. Region will issue site specific approvals.
PCB Destruction Company	12/13/81	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	-	Demonstration 3-82 in Region VII apparently successful; awaiting additional data.

(continued)

TABLE 1 (continued).

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
PMI, Inc.	12/14/81	Mobile	PCB contaminated waste oil	Chemical	Dechlorination		Approved March 26, 1982 for mineral oil dielectric fluids only.
Transformer Consultants, Division of S.D. Myers	04/05/82	Mobile	PCB contaminated mineral	Chemical	Dechlorination	Demonstration run conducted 14, 15 April 1982 in Region V	Approved November 29, 1982 for fluids containing up to 3000 ppm of PCBs.
Transformer Services, Inc.	06/01/82	Concord, N.M.	Mineral oil dielectric fluid	Chemical	Dechlorination	Bench scale demonstration 16 June 1982	Bench scale demonstration on 1600 ppm waste successful; expect application this fall for full scale process.
General Electric	9-9-82		PCB contaminated transformer oil	Chemical	Sodium		Under Review.
Franklin Institutes	10-25-82		PCB contaminated transformer oil	Chemical	Sodium (NaPEG)		Under Review.
SED, Inc.	11-12-82	Waubeegan, Wisconsin	Capacitors	Methan-ical shredding with solvent extraction	Capacitor Reclamation		Under Review.
<u>Landfill</u>							
No landfill approved for PCB disposal in Region I.							

7/1/83

TABLE 2. INFORMATION ON PCB ACTIVITIES - REGION II

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal disposal</u>							
General Electric		Waterford, NY	PCB contaminated waste oil	Thermal	Incineration	Demonstration test conducted September 1978	Originally approved September 1978 for 3 years; Permit renewed March 31, 1982 for an additional 5 years.
Consolidated Edison of NY	1-80	Ravenwood Station, Astoria, NY	PCB contaminated waste oil	Thermal	High efficiency boiler	-	Withdrew application.
Alcoa	Feb. 1981	Messine, NY	PCB contaminated waste oil	Thermal	High-efficiency boiler	-	Application never completed.
Atlantic Electric	2-81	New Jersey					Informal inquiry.
Trofe	April 1981	Mount Laurel, NJ	PCB contaminated solid and liquid waste	Thermal	Multichamber incinerator	Awaiting test burn plan	Awaiting state approval and other additional information.
Hollins	May 1981	Bridgeport, NJ	PCB contaminated waste oil	Thermal	Incineration	-	Hollins is currently upgrading facility to meet state standards; once complete, they will complete application to Region II.
MEWCO	Spring 1981	Niagara Falls, NY	PCB contaminated transformers	Non-thermal	Solvent cleaning, batch distillation to concentrate residue	-	Test protocol, operations plan submitted 11-82. Region II comments sent 12-82. Reply to comments received 3-83, currently under review.
SUNOHIO	Summer 1981	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	Demonstrated nationally 10-24-80	Approved April 28, 1982, maximum allowable PCB concentration into reactor-500 ppm. SUNOHIO on 20 July 1982 requested modifications to approval to allow processing of fluids with up to 2500 ppm of PCB. Approved November 9, 1982 for 2500 ppm.
ACUREX	Summer 1981	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	Demonstrated nationally 09-09-81	Approved April 28, 1982. Maximum allowable PCB concentration into reactor-1062 ppm. Design change submitted November 4, 1982, approved 1-83 to allow wastes with up to 7500 ppm of PCBs into the reactor.

(continued)

TABLE 2 (continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
Power Authority of New York	Summer 1981		PCB mineral oil	Thermal	High efficiency utility boiler		No longer interested.
EPA Mobile Incinerator (IT Corp.)	October 1981	Mobile	PCB contaminated waste oil	Thermal	Incinerator	Trial burn conducted 1/3-7/83	Trial burn permit issued July 6, 1982. Awaiting trial burn test results.
Pyro-Magnetics	Nov. 1981	Mobile	PCB contaminated waste oil	Thermal	Incineration	Test Burn Plan submitted Nov. 1981	Test results received May 17, 1982. Additional data requested. Company is being taken over by Energy Services Company (ENSOJ).
PMI, Inc.	Dec. 1981	Mobile	PCB-contaminated waste oil	Chemical	Dechlorination	-	Additional data received, under review. Public comment period ended March 4, 1983. Authorization is being prepared.
PCB Destruction Company	Dec. 1981	Mobile	PCB-contaminated waste oil	Chemical	Dechlorination	-	Awaiting test report from last demonstration run. Requested additional information.
Bengert & Menzel, Inc.	Feb. 1982	South Buffalo, NY	200 cubic yards of PCB contaminated soil	Nonthermal in situ	Sodium polyethylene glycol (Na PEG) process	-	Results of the NaPEG testing were unfavorable. A test plan utilizing the KPEG process was requested.
Niagara Mohawk	Feb. 10, 1982	Syracuse, NY	PCB-contaminated transformer fluids	Nonthermal	-	-	Requested research and development status to study alternative nonthermal methods of removing PCBs from transformer fluids. Approved for benchscale testing July 20, 1982. Additional data requested for pilot plant studies.
Transformer Consultants	April 1982	Mobile	PCB contaminated mineral oil	Chemical	Dechlorination	-	Under review, public comment period ended 3-4-82. Authorization has been drafted.
Puerto Rico Electric Power Authority (PREPA)	June 8, 1982	San Juan Station Units 8 & 9	PCB contaminated mineral oil	Thermal	High efficiency utility boiler	-	Application incomplete. Additional data requested July 21, 1982.

(continued)

TABLE 2 (continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
Long Island Lighting Company (LILCO)	August 8, 1982	Barrett Station Unit #2	PCB contaminated mineral oil	Thermal	High efficiency utility boiler	-	Responded to EPA comments 2-d). EPA replying to this response.
General Electric	September 1982		PCB contaminated mineral oil	Chemical	Catalyzed sodium process	-	Additional data requested.
Franklin Institutes	October 18, 1982		PCB contaminated mineral oil	Chemical	MaPEG	-	Additional data requested.
SED	October 30, 1982		Capacitors	Proprietary		-	Awaiting response to EPA comments.
<u>Landfills</u>							
CECOS No. 2		Niagara Falls, NY	PCB contaminated solids (capacitors, transformer bodies, etc.)	Landfill		-	Approved August 1978, now closed.
CECOS No. 3		Niagara Falls, NY	PCB contaminated liquids, sludges (50-500 ppm)	Landfill		-	Approved March 1980, open and operating.
CECOS No. 4		Niagara Falls, NY	PCB contaminated liquids, sludge (50-500 ppm)	Landfill		-	Approved January 1982. New liner system in use.
CECOS No. 5		Niagara Falls, NY	PCB contaminated liquids, sludge (50-500 ppm)	Landfill		-	Under review.
SCA Chemical Services No. 7		Model City, NY	PCB contaminated solids, sludges (50-500 ppm)	Landfill		-	Approved October 1978, open and operating.
No. 10		Model City, NY	PCB contaminated solids, sludges (50-500 ppm)	Landfill		-	Approved April 27, 1982.

(continued)

TABLE 2 (continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Summary	Status
NY DEC Hudson River PCB Project Site No. 10		Vicinity of Fort Edwards, NY	Sediment from hot spot dred- ging of Hudson River	Landfill	-	-	Two phase approval, initial phase under active consideration. EIS out for comment.
NY DEC Moreau Site		Moreau, NY	Dredge spoils	Landfill	-	-	Approved September 1978, one time use landfill, now closed.
NY DEC West Glens Falls Site		West Glens Falls, NY	Contaminated soils, capacitors	Landfill	-	-	Approved October 1979, one time use landfill, now closed.
NY Dept. of Transportation - Buoy 212		"Off-River" Hudson River, New York	Dredge spoils	Landfill	-	-	Approved September 1979, one time use landfill, closed.
- Special Area 13		"	Dredge spoils	Landfill	-	-	Approved September 1979, one time use landfill, now closed.
<u>Abandoned Landfill Sites (Agreements made between NY DEC and GE to cover exposed wastes)</u>							
NY DEC/ General Electric		Fort Miller, NY	PCB contain- ated solids	Landfill	-	-	Remedial plans under review, engineering plans approved, site work to begin Spring 1982.
NY DEC/ General Electric		6 additional sites (un- specified)	PCB contain- ated solids	Landfill	-	-	Remedial plans for all six sites now in prelim- inary review.

at 1
2

2855-5382
2855-5382
2855-5382

2855-5382
2855-5382
2855-5382

2855-5382
2855-5382
2855-5382

TABLE 3 (continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
Franklin Institute/Philadelphia Electric	05-28-81	Philadelphia, PA	PCB contaminated transformer oil	Chemical	Dechlorination	Pilot scale demonstration successfully conducted April 21, 1982 on 7406 ppm waste	Approved for pilot disposal study 09-25-81. Approved 9-28-82 for 7406 ppm at reactor.
General Electric	05-29-81	Philadelphia, PA	PCB contaminated transformer oil	Chemical	Dechlorination	Pilot scale demonstration successfully conducted May 14, 1982 on 1050 ppm waste	Approved for pilot disposal study 09-25-81. Approved 9-28-82 for 1050 ppm at reactor.
SUMOMO	09-11-81	Mobile (Canton, OH)	PCB contaminated transformer oil	Chemical	Dechlorination PCBx process	Demonstrated successfully at 192 ppm in Region V 10/24/80	Approved 5-6-82 for maximum allowable PCB concentration at reactor of 500 ppm. Approved 9-9-82 for 2500 ppm at reactor.
SUMOMO	7-23-82	Jeannette, PA	PCB contaminated heat transfer fluid	Chemical	Dechlorination (PCBx process)	Test conducted 1-18-83	One-time R&D test approved 12-14-82. Based on test result approval granted 3-21-83 for up to 4500 ppm PCBs in heat transfer fluid and HODF.
Life Enterprises Inc.	09-24-81	Bern Township, (Reading) PA	PCB contaminated transformer oil	Chemical	Dechlorination	Demonstration runs conducted 11-3-82, 11-17-82	Approved 9-23-82 for small pilot study R&D. Test unsuccessful will re-apply for further R&D.
Pyro-Magnetics	11-27-81	Mobile (Whitman, MA)	PCB contaminated transformer oil	Thermal	Incinerator	Trial burn conducted at Tullahoma, TN March, 1982	Company sold to ENSCO, awaiting further developments
PCB Destruction Company	12-08-81	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	Demonstration run conducted in Kansas City March 25, 1982	No recent contact with company.

(continued)

TABLE 3 (continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
PMI, Inc.	12-14-81	Mobile (Overland Park, KS)	PCB contaminated waste oil	Chemical	Dechlorination	Demonstration run scheduled late May 1982.	30-day comment period signed by R.A. 3-6-83.
Transformer Consultants, Division of S.D. Myers	04-05-82	Mobile	PCB contaminated mineral oil	Chemical	Dechlorination	Demonstration conducted April 14-15, 1982 Stow, Ohio	Two separate processes, one batch, one continuous; 30-day comment period recommended to R.A. for signature.
<u>Landfills</u>							
No landfills are approved for PCB disposal in Region III.							
Brown, Boveri Electric Company	8-19-82	Philadelphia PA	PCB contaminated concrete slab	Landfill	Variance from drumming during transportation		Awaiting company's final disposal plan. Meeting scheduled for April.
City of Philadelphia (SEPTA)	8-24-82	Philadelphia, PA	PCB debris and contaminated railroad ties	Landfill	Encapsulation		Awaiting submittal of complete proposal
Goodyear Tire & Rubber Company	9-14-82	Point Pleasant, W.VA	PCB contaminated soil	Landfill	Encapsulation		Proposal under review. EPA comments sent to company 11-3-82.

TABLE 4. INFORMATION ON PCB ACTIVITIES - REGION IV

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal disposal</u>							
Florida Power & Light		Sanford, FL	Undiluted abateal (60-100X PCB)	Thermal	High efficiency utility boiler	Test burn conducted 5/26/76	PCB destruction efficiency >99.9%.
Tennessee Eastman Co.	March 1979	Kingsport, TN	PCB contamination waste oil	Thermal	High efficiency coal-fired industrial boiler	Test conducted 11/5-9/79	PCB destruction efficiency >99.7%. Facility inspected by Region IV in July 1981, approved and in compliance.
SUNOWID	March 1981	Mobile	PCB contamination waste oil	Chemical	Dechlorination process	Nationally demonstrated 10-24-80	Approved, April 1981. Process demonstrated at TVA, Muscle Shoals, Alabama, 12-16-81. No PCB concentration limit.
Duke Power Co.	May 1981	Riverbend Sta.	PCB contamination	Thermal	High efficiency boiler	Test burn 10-81	Test results received. PCB destruction efficiency >99.92 percent.
TVA-Widow's Creek	06/10/81	Bridgeport, AL	PCB contamination waste oil	Thermal	High efficiency coal-fired utility boiler	Test burn conducted 11-15-81	Test results sent to EPA headquarters.
Chemical Waste Management H.T. Vulcanus	-	Mobile-Offshore Mobile, AL	PCB contamination waste oil	Thermal	Liquid injection incinerator	Demonstration burn at sea, week of 12-14-81	Federally-approved under Ocean Protection Act. On-shore storage facility inspected by Region IV. Two more trips scheduled. Final approval pending reevaluation of test burn data.
Acurax	July 1981	Mobile	PCB contamination waste oil	Chemical	Dechlorination	Demonstrated nationally 09-09-81	Approval issued June 4, 1982.
Pyro-Magnetics, Corp.	10-16-81	Tallahassee, FL	PCB contamination waste oil (PCBs 50X by weight)	Thermal	Incinerator	Pilot burns conducted 12-09-81, March 1982	Process acceptable but site specific approvals required.
PMI, Inc.	12-14-81	Atlanta, GA	PCB contamination waste oil	Chemical	Dechlorination		Approved March 1, 1982.

TABLE 4 (continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
American Environmental Protection Corp.	02/82	Jacksonville, FL	PCB-contaminated waste oil	Thermal	Incinerator		Withdrew application.
Transformer Consultants	05-07-82	Mobile	PCB-contaminated mineral oil	Chemical	Dechlorination	-	Approved November 23, 1982.
Florida Power & Light (Gainesville Regional Utilities)	-	Gainesville, FL					Inquiry made, will be submitting formal notification.
Georgia Power & Light							Inquiry made, no formal notification given.
SED	04-26-82	Greensboro, NC	PCB capacitors	Mechanical	Shredding with extraction	-	Approved June 29, 1982 as alternate disposal for capacitors; liquid/liquid extraction used to remove (but not destroy) PCBs.
General Electric	9-8-82		PCB-contaminated transformer oil	Chemical	Sodium (NaPEG)		Approval imminent.
Carolina Power & Light	11-12-82	Cape Fear Moncure, NC	PCB contaminated mineral oil	Thermal	High efficiency boiler		Under review.
Franklin Institutes	02-10-82		PCB contaminated mineral oil	Chemical	Sodium (NaPEG)		Under review.
<u>Landfills</u>							
Chemical Waste Management	1977	Emelle, AL	Solids, liquids (50-500 ppm PCB)	Landfill			Initial site approval 1978, 5 PCB cells, each cell approved individually; 2 cells now closed 3 cells active (approved 12-80)
Warren County, NC	12/78	Warren County PCB site, NC	PCB spill material	Landfill			One-time landfill of PCB spill material, original approval 06-79, contested in court, resolved in 1981, final approval 12-11-81.
Sagamo Electric	10/79	Pickens, SC	PCB contaminated soil	Landfill			Approved August 1980 - One-time landfill of spill material.

TABLE 5. INFORMATION ON PCB ACTIVITIES - REGION V

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and Nonthermal Disposal</u>							
Peerless Cement Company		Detroit, MI	PCB contaminated waste oil	Thermal	Cement kiln	-	EPA-sponsored destruction efficiency test in 1978. Facility applied for approval in 1980, then withdrew application.
Merlin Assoc./ Envirocycle Corp. (now owned by Geostar Conservation Systems Inc.)	05-03-79	Kankakee, IL	PCB contaminated waste oil	Thermal	Incinerator		Under review, awaiting construction completion. Estimated completion date is unknown.
SUNOHIO (A)	05-16-80 (To OPTS)	Mobile	PCB contaminated waste oil	Chemical	Detoxification PCBx process	Second demonstration run scheduled 5-11-82	Approved 4-13-82, maximum allowable PCB concentration into reactor-500 ppm. Approved 7-14-82 for maximum concentration of 2500 ppm.
SUNOHIO (B)	03-29-82	Mobile	PCB contaminated waste oil	Chemical	Detoxification PCBx process	-	Research and development on PCBx process, debug, fine-tune new mobile units, approved 4-13-82.
Illinois Power Company	06-18-80	Baldwin, IL	PCB contaminated mineral oil	Thermal	High efficiency utility	PCB burn conducted 11-21-80	Stop burn order issued 03-10-81 due to waste oil storage uncertainties, issue resolved 05-25-81
Acurex (A)	02-06-81	Mobile	PCB contaminated waste oil	Chemical	Detoxification	Demonstrated nationally 09-09-81	Approved 3-2-82, maximum allowable PCB concentration into reactor-1062 ppm.
Acurex (B)	08-01-81	Cincinnati, OH	PCB capacitors	-	-	-	Research and development project to decontaminate PCB capacitors. Approved 12-30-81.
Acurex	11-22-82	Mobile	PCB contaminated waste oil	Chemical	Detoxification	Demonstration run conducted 2/14-16/83	Research and development process optimization, approved 1-13-83, demonstration results received 3-10-83.
Acurex	12-13-82	Cincinnati, OH	PCB contaminated soils	Chemical	Dechlorination		Research and development of soils decontamination, bench scale, approved 3-8-83.
Acurex	12-13-82	Kingsbuck, IN	Polygone proprietary solvent	Chemical	Dechlorination		Research and development, joint venture with Polygone Corp., Approved 3-9-83

(continued)

TABLE 5 (continued).

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
General Motors Corp. Chevrolet Division	05-01-81	Bay City, MI	PCB contamin-ated waste oil	Thermal	High effi- ciency oil- fired indu- strial boiler	Verification burn conducted 05-80	Approval issued 07-10-81.
Metropolitan Sewer District	06-22-81	Cincinnati, OH	PCB contamin-ated waste oil	Thermal	High effi- ciency indu- strial boiler	Requested trial burn plan 7/20/81	Reconsidering due to public opposition.
PCB Eliminator, Inc.	08-10-81	Mobile	PCB contamin-ated mineral oil and diesel- tric fluid	Chemical	Detoxification	Requested trial run plan 09-11-81	Awaiting additional information, bench scale test conducted in Region VII. Company has apparently been dissolved per Region VII.
Oster Tail Power Company	10-01-81	Fergus Falls, MN	PCB contamin-ated mineral oil	Thermal	High effi- ciency utility boiler		Approved 11-04-81. Amended authorization conditions issued 12-10-81.
Goodyear Tire & Rubber Co.	10-13-81	Akron, Ohio	PCB contamin-ated waste oil	Chemical	Detoxification		Approved 10-30-81. Research and development project.
Transformer Consultants	10-15-81	Akron, OH	PCB contamin-ated waste oil	Chemical	Detoxification	Test run con- ducted in Stow, Ohio 14-15 April 1982.	Approved 11-02-81. Research and development project. Approved for extension of R&D work 5-28-82, test report received. Approved 11-29-82.
Transformer Consultants	10-09-82	Akron, OH	PCB contamin-ated waste oil	Chemical	Detoxification		R&D process optimization, approved 12-15-82.
Polygone Corp.	10-28-81	Warrenville, IL	PCB contamin-ated waste oil	Chemical	Detoxification		Approved 11-24-81. Bench scale research project.
Polygone Corp.	12-13-82	Kingbury, IN	PCB contamin-ated hydraulic fluids	Thermal	Decontamina- tion		Approved 1-14-83.
Pyro-Magnetics Corp.	11-03-81	Laporte, IN	PCB contamin-ated waste oil	Thermal	Mobile Incinerator	Pilot burn 2-7 March 1982 Tullahoma, TN	Trial burn report received. Draft approval con- ditions and technical findings completed. Approved 12-17-82.
Columbus & Southern Ohio Edison	5-80						Informal inquiry.

(continued)

TABLE 5 (continued).

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
SCA Chemical (A) Services	9-2-82	Chicago, IL	PCB contaminated waste oil	Thermal	Incineration		Trial burn plan approved 9-16-82.
SCA Chemical (B) Services	9-16-82	Chicago, IL	Shredded PCB capacitors	Thermal	Incineration		Under review, analyzing data.
Pollution Science International	9-15-82	Glen Cox, IL	PCB contaminated sediments	Thermal	Stripping		Research and development project, approved 10-18-82.
Hoosier Energy, Inc.	10-13-82	Bloomington, IN	PCB contaminated dielectric fluid	Thermal	High efficiency boiler		Approved (submittal acknowledged) 12-7-82.
Dow Corning Corp.	11-12-82	Midland, MI	PCB contaminated silicon fluids	Physical	Absorption		Bench scale, approved 3-2-83.
SED, Inc.	11-30-82	Waukegan, WI	PCB capacitors	Mechanical	Shredding with extraction		Additional data requested 12-7-82, awaiting response.
<u>Landfills</u>							
Clermont Environmental Reclamation Co.							
No. 3	07-26-78	Williamsburg, OH	Chemical	Landfill			Approved 09-28-78. Now closed.
No. 4/5	02-04-80	Williamsburg, OH	Chemical	Landfill			Approved 05-09-80, nearly filled and closure is commencing.
No. 6-17	03-25-81	Williamsburg, OH	Chemical	Landfill			Approved 07-31-81.
Allie Chalmers	02-17-81	Appleton, WI	Chemical	Landfill	Sodium Polyethylene glycolate (MAPEG) process		Test of Na PEG Process approved 09-09-81. Approval expired 3-82.
Tecumseh Prod.	04-07-81	Sheboygan Falls, WI	Chemical	Landfill			On-site one time disposal, approved 6-24-82.
John Sexton Contractors	08-28-81	Des Plaines, IL	PCB contaminated dredge materials	Landfill			Approved 10-13-81. Request for variance from conditions of approval rec. 11-25-81. Dredging will not take place, approval will expire.

(continued)

TABLE 5 (continued).

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
Northern States Power Company	12-18-81	Minneapolis, MN	PCB transformer fluids	Thermal	High efficiency boiler		Approved 1-8-82.
PCB Destruction Company	12-14-81	Kansas City, MS	PCB contaminated waste oil	Chemical	Mobile detoxification	Demonstration run conducted in Region VII 25 March 1982	Under review. Second test run requested.
Dowser Electric Company	01-07-82	Mount Vernon, IL	PCB contaminated waste oil	Chemical	Detoxification (Goodyear process)	Test run on 10-5-82 unsuccessful.	Research and development project approved 2-21-82. Test plan approved 9-16-82, second test plan approved 1-4-83.
PPM-PCB Management	01-11-82	Kansas City, MS	PCB contaminated waste oil	Chemical	Mobile detoxification		Approved 2-18-83 for 1100 ppm.
Transformer Service, Inc. (A)	04-22-82	Akron, Ohio	PCB contaminated waste oil	Chemical	Mobile detoxification		Under review.
Transformer Service, Inc. (B)	05-17-82	Akron, Ohio	Mineral oil dielectric fluid	Chemical	Detoxification		Research and development project approved 8-5-82. Request for extension approved 12-3-82.
CH2M Oil Corporation	06-17-82	Warren, Ohio	Mineral oil dielectric fluid	Chemical	Detoxification		Research and development project. Approved 9-3-82.
MTL Corp.	06-21-82	Waukegan, Wisconsin	Mineral oil dielectric fluid	Chemical	Detoxification		Research and development project, approved 6-28-82. Final R&D report received 1-26-83.
Midland-Ross	06-28-82	Toledo, Ohio	Solid PCB contaminated material	Thermal	Pyrolysis		Research and development project, approved 7-16-82.
Transformer (A) Recovery	8-2-82	Brighton, MI	PCB contaminated mineral oil	Chemical	Dechlorination		Under review.
(B)	8-2-82	Brighton, MI	Capacitors	Chemical	Decontamination		Research and development project, approved 10-8-82. Submitted test report 12-2-82.
General Electric	9-8-82	Mobile Schenectady, NY	PCB contaminated mineral oil	Chemical	Catalyzed sodium detoxification		Additional information requested, 10-18-82, awaiting response.

(continued)

TABLE 11. EPA REGIONAL OFFICE AND TECHNICAL ASSISTANCE CONTACTS AT REGIONS I - X

Region/Address	Contact*	Division	Telephone No.	Region/Address	Contact*	Division	Telephone No.
U.S. EPA, Region I John F. Kennedy Bldg. Room 2303 Boston, MA 02203	Paul Mefferman	Air Management	(617) 223-0585	U.S. EPA, Region VI 1201 Main Street Dallas, TX 75270	Jim Sales Regional PCB Coordinator	Technical Section Air & Waste Management Division	(214) 767-8941
	Chuck Lincoln	Air Management	(617) 223-7740		Martin Allen	Technical Section Air & Waste Management Division	(214) 767-8941
	Tom Michel	Air Management	(617) 223-5137		Larry Thomas Regional Toxic Coordinator	Pesticides & Toxic Substances Branch	(214) 767-2734
U.S. EPA, Region II Federal Office Bldg. 26 Federal Plaza New York, NY 10007	John Brogard	Air & Waste Mgmt.	(212) 264-2637		Phil Schwindt	Environmental Services Division	(214) 767-2727
	Jerry McKenna	Env. Services	(201) 321-6645	U.S. EPA, Region VII 324 East 11th Street Kansas City, MO 64106	Steve Bush	Permit. Waste Management Branch	(816) 374-6531
	Arthur M. Gavirtz	Env. Services	(201) 321-6667		Marvin Frye Regional PCB Coordinator	Toxic & Pesticides Section	(816) 374-3036
	Dan Kraft	Env. Services	(201) 321-6667		Steve Farrow Regional PCB Coordinator	Toxic Substances Branch	(303) 837-3926
	Herman Phillips	Public Awareness	(212) 264-2515	U.S. EPA, Region VIII 1860 Lincoln Street Denver, CO 80203	Dean Gillam Regional Toxic Coordinator	Toxic Substances Branch Coordinator	(303) 837-3926
U.S. EPA, Region III Curtis Building Sixth & Walnut Streets Philadelphia, PA 19106	Edward Cohen	Environmental Services	(215) 597-7668	U.S. EPA, Region IX 215 Fremont Street San Francisco, CA 94105	Raymond Seid	Toxic and Waste Management Branch	(415) 974-8389
	Christopher Pilla	Environmental Services	(215) 597-4651		Jim Suhrer	Office of Technical & Scientific Assistance	(415) 974-8085
	Michael Vaccaro	Regional Council	(215) 597-9477	U.S. EPA, Region X 1200 6th Avenue Seattle, WA 98101	Charles W. Rice	Waste Management Branch	(206) 442-2850
	K.K. Wu	Environmental	(215) 597-7683		Roger Fuentes Regional PCB Coordinator	Waste Management Branch	(206) 442-2850
U.S. EPA, Region IV 345 Courtland, NE Atlanta, GA 30365	Ralph Jennings Regional Toxics & PCB Coordinator	Air & Waste Management	(404) 881-3864		Jim Everts Regional Toxic Coordinator	Permits & Compliance Branch	(206) 442-1090
	Don Hunter	Air & Waste Management	(404) 881-3933				
	Howard Zeller	Enforcement	(404) 881-2211				
	Constance Allison	Air & Waste Management	(404) 881-3864				
	James Finger	Surveillance & Analysis	(404) 546-3136				
	Francis Redman	Public Awareness	(404) 881-3004				
U.S. EPA, Region V 230 S. Dearborn St. Chicago, IL 60604	Y. J. Kim	Waste Management	(312) 353-1428				
	Bill Muno	Waste Management	(312) 886-6136				

APPENDIX A

REGION I - PAUL HEFFERNAN

There has been very little activity since the last update. The New Bedford sludge incinerator test has been postponed indefinitely due to the inability of the plant to purchase needed replacement equipment. The Transformer Consultants chemical dechlorination submittal received Region I approval on November 29, 1982. Fluids with up to 3000 ppm of PCBs can be processed by this system. All remaining outstanding submittals are either under review by the Region I staff or awaiting additional information from the company. There were no new submittals since the November 1982 update.

REGION II - JOHN BROGARD

John Brogard has taken over responsibility for PCB updates. A test protocol and an operations plan were received from NEWCO in November 1982. Region II commented on these plans in December 1982, and a response to these comments was received in March, 1983. The entire application is currently under review. The Acurex request to allow wastes with up to 7500 ppm into its system's reactor vessel was approved in January, 1983. A trial burn of the EPA mobile incinerator was held January 3-7, 1983 in Edison, New Jersey. Region II is awaiting results of this test series. The Region has been informed that Pyro-Magnetics is being taken over by Energy Services Company (ENSCO), of El Dorado, Arkansas. The public comment period for both the PPM and the Transformer Consultant submittals ended March 4, 1983 and authorization letters for both mobile systems are in preparation. Results of the NaPeg process testing conducted for Bengart & Memel were unfavorable. The company will now use the potassium polyethylene glycol (KPEG) process and a test plan has been requested by Region II. A response by the Long Island Lighting Company (LILCO) to EPA comments was received in February 1983. Region II is preparing additional comments. The Region has requested additional data from General Electric and Franklin Institutes relative to their chemical dechlorination process applications. Finally, Region II is awaiting a response to its comments from SED relative to their capacitor reclamation process.

REGION III - ED COHEN

A one time test of the modified SUNOHIO process was conducted on January 18, 1983. Based on this demonstration, Region III on March 21, 1983 granted the company approval for the disposal of heat transfer fluids and

mineral oil dielectric fluid (MODF) containing up to 4500 ppm of PCBs. A test of the Life Enterprises chemical dechlorination process was unsuccessful and the company will reapply for further research and development efforts. The applications of both Pyromagnetics and PCB destruction company are on hold, awaiting further contact from the companies. The 30-day public comment period for the PPM submittal was signed March 6, 1983. The Region III staff has recommended that the regional administrator enact a similar 30-day comment period for the Transformer Consultants mobile dechlorination proposal. There were no new thermal or nonthermal submittals since November. With regards to landfills, a meeting will be held with Brown, Boveri to discuss their landfill submittal and Region II has forwarded to the company its comments on Goodyear Tire Company's landfill proposal.

REGION IV - RALPH JENNINGS

Region IV has seen little PCB activity since November. The General Electric submittal has been reviewed and approval is imminent. The Carolina Power & Light Company, high efficiency boiler submittal is in the final review stages, with a few specific points concerning combustion gas monitoring still under discussion. Region IV received the Franklin Institutes Chemical Dechlorination submittal in early February and is currently reviewing it.

REGION V - BILL MUNO

Three new Acurex submittals have been received since the November update. All involve research and development projects. The first concerned process optimization of the Acurex chemical dechlorination process. This R&D effort was approved January 13, 1983, a demonstration run was conducted February 14-16, 1983 and demonstration results were received March 10, 1983. The second project concerned a bench scale investigation of soil decontamination methods. It was approved March 8, 1983. The final application concerned a joint effort between Acurex and Polygone Corporation. Polygone will remove PCBs from hydraulic fluids while the Acurex process will detoxify these PCBs. This proposal was approved March 9, 1983. The Transformer Consultants application was approved November 29, 1982. A second Transformer Consultants submittal, for process optimization, was approved December 15, 1982. A second application was also received from Polygone Corporation concerning their joint venture with Acurex. This submittal was approved January 14, 1983. The Pyro Magnetics Mobile Incinerator was approved by Region V on December 17, 1982. A second test run plan was received from Dowzer Electric Company for their evaluation of the Goodyear Chemical Detoxification process. This application was approved January 4, 1983 and the test was scheduled for mid-April 1983. The PPM-PCB Management submittal was approved February 18, 1983 for treatment of wastes contaminated with up to 1100 ppm of PCBs. Transformer Services requested an extension of their R&D approval and this was granted December 3, 1982. A final report was received from RTE Corporation on their chemical detoxification R&D study on January 12, 1982 for their capacitor decontamination study. Region V is awaiting additional information from General Electric before acting on this submittal. Several new submittals have

March 31, 1983

Office of Pesticides and
Toxic Substances

Volume 9

Introduction

This is the ninth in a series of reports designed to inform responsible Headquarters, Laboratory and Regional Office personnel of PCB-related activities in U. S. EPA Regions VI-X. Together with a companion report for Regions I-V, it will serve to update the current status of all regional actions related to implementation of the PCB (disposal) regulations (40 CFR 761).

Permit Activities

The current status of all thermal and nonthermal PCB destruction activities in Region VI through Region X are reported in Tables 6-10. The companion report presents permit activities information for Regions I-V in Tables 1-5. Table 11, which is common to both reports, presents the principal PCB and toxic waste contacts for PCB-related assistance. A narrative of the updated data obtained from Regional Office Contacts for Regions VI-X is provided in Appendix A.

Technical Assistance Under This Program

An objective of this program is to provide technical and coordinative assistance as required to Regional Offices (Regions I-X) in the implementation of the PCB Regulations. The technical assistance will be provided on a first-come first-served basis and will include, but will not be limited to, the following:

Item 1 - Provision of background information on the conduct of thermal or non-thermal PCB destruction/disposal operations in accordance with Federal requirements and guidelines.

Item 2 - Providing (pre-notice) facility inspections and evaluations in order to establish the expected quality of any disposal/destruction activities that could be conducted at the facility. Such evaluation shall identify the "verification test" potential of the facility.

Item 3 - Review and comment on source "test plans" for the destruction/disposal of PCB waste materials in accordance with Federal requirements and guidelines.

Item 4 - Monitoring and reporting on the conduct of "test destructions" and data obtained in accordance with quality assurance/quality control systems audit procedures.

For technical assistance under this program, please contact David C. Sanchez, Environmental Protection Agency, IERL, Research Triangle Park, North Carolina, telephone number (919) 541-2547.

TABLE 6. INFORMATION ON PCB ACTIVITIES - REGION VI

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal Destruction</u>							
Energy Systems Company (ENSCO)	March 1978	El Dorado, Arkansas	PCB Contaminated solid waste	Thermal	Incineration	Test burn conducted Dec. 1981, results available.	Approved February 7, 1983. Company applied for a PCB drum reclamation permit on March 17, 1983
Dow Chemical	September 1979	Freeport, Texas	Process waste stream (vinyl chloride)	Thermal	Incineration	Test burn complete, results are available.	Approved April 1982
Dow Chemical	September 1979	Plaquemine, Louisiana	Process waste stream (vinyl chloride production)	Thermal	Incineration	Test burn complete, results are available.	Approved June 1982.
Dow Chemical	September 1979	Oster Creek, Texas	Process waste stream (vinyl chloride production)	Thermal	Incineration	Test burn complete, results are available.	Approved June 1982.
Volcan Material Company	January 1980	Greismon, Louisiana	Process vinyl chloride waste	Thermal	Incineration	First test burn conducted June 1981. Second test burn conducted Nov. 1981.	Draft approval March 18, 1983. Final decision in process.
Rollins Environmental Services	April 1980	Deer Park, Texas	PCB contaminated solid waste	Thermal	Incineration	First test burn conducted Nov. 9-13, 1981. Tests were also conducted in June & July 1982.	Approved January 1983.
LaPort Chemical Corporation	July 1980	Pasadena, Texas	Heavy bottoms, vinyl chloride process waste	Thermal	Incineration	Test burn conducted July 1981.	Approved June 1982.
PPG	1980	Lake Charles, Louisiana	Process waste stream	Thermal	Incineration	Trial burn scheduled for April 11, 1983.	Under preliminary review.
SUNOHIO	September 1981	Hobbs	Mineral oil dielectric fluid	Chemical	Dechlorination	Demonstrated nationally 10/24/80	Approval granted October 21, 1982, to treat mineral oil dielectric fluids with 2500 ppm PCBs.

(continued)

TABLE 6. (Continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
Pyro-Magnetics	November 1981	Mobile	PCB contaminated waste oil.	Thermal	Incineration	1st pilot burn conducted Dec 9, 1981, Tullahoma, TN in Region IV. 2nd pilot burn conducted March 5, 1982.	Under review. Test results are available.
Acurex	November 1981	Mobile	PCB contaminated oil.	Chemical	Dechlorination	Demonstrated nationally 9/9/81.	Approved May 3, 1982. Modified to treat up to 7500 ppm PCBs.
PPM, Inc.	December 1981	Mobile	PCB contaminated Mineral oil	Chemical	Dechlorination	Demonstration tests were conducted in Nov. 1981 in EPA Region VII. Test results are available.	Approved March 7, 1983.
Los Alamos Scientific Laboratories	February 1982	Los Alamos, New Mexico	PCB contaminated transformer fluid	Thermal	Incineration	Pretest meeting conducted on 10-11 May 1982. Test burn conducted in June 1982.	Under review. Test burn results have been received.
Transformer Consultants	May 1982	Mobile	PCB contaminated mineral oil	Chemical	Dechlorination	Demonstration tests were conducted on April 14, 1982 in EPA Reg.V. Test results are available	Approved March 7, 1983

(continued)

TABLE 6. (Continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
San Angelo Electric Company	June 1982	San Angelo, Texas	PCB Contaminated mineral oil	Chemical	Dechlorination	Demonstration tests not scheduled at this time.	Under preliminary review waiting for test plan. Company intends to treat mineral oil up to a maximum of 9000 ppm PCBs.
General Electric	August 1982	Mobile	PCB contaminated mineral oil	Chemical	Dechlorination	Demonstration tests were conducted in May 1982 in EPA Region III. Test results are available.	Approved March 7, 1983.
Franklin Institute Research Laboratory	October 1982	Mobile	PCB contaminated mineral	Chemical	Dechlorination	Pilot Scale demonstration successfully conducted April 21, 1982 on 7406 ppm waste in EPA Region III.	Approved March 7, 1983.
SED Incorporated	October 1982	Mobile	PCB contaminated capacitors	Mechanical	Shredding and rinsing of capacitors	Demonstration tests not scheduled at this time	Under preliminary review waiting for response to questions.
Huber Corp.	December 1982	Borger, Texas	PCB contaminated soil	Thermal	Pyrolysis	Pilot scale test planned for May 1983	Under preliminary review
Biotechnology, Inc.	January 1983	Houston, Texas	PCB sludge	Biological -	Bio-degradation	Research project conducted Jan. 1983. Demonstration tests not scheduled.	Under preliminary review
<u>Landfills</u>							
Lipsitzs	December 1980	Waco, Texas	PCB contaminated oils	Landfill	-	-	Closure plan completed. EPA has requested additional information from Lipsitzs. Cleanup order sent out for signatures.

TABLE 7. INFORMATION ON PCB ACTIVITIES - REGION VII

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal Destruction</u>							
SUNOHIO	October 1980	Mobile	PCB Contaminated mineral oil	Chemical	Dechlorination	Demonstrated nationally 10/24/80	Approved Nov. 1981 for mineral oil dielectric fluids up to 10,000 ppm PCBs.
PCB Destruction Company	May 1981	Mobile	Dielectric mineral oils up to 10,000 ppm PCBs	Chemical	Dechlorination	First full scale test conducted Dec. 1980. Second test conducted March 25, 1982.	Interim approval granted from June 1, 1982 to December 1, 1982. Results from second tests show PCB concentration reduced from 1000 ppm to 1 ppm.
Acurex	May 1981	Mobile	Dielectric mineral oils up to 10,000 ppm PCBs	Chemical	Dechlorination	Demonstrated nationally 9/9/81.	Interim approval renewed for 3 year period, starting in October 1982.
Environmental International Inc.	May 1981	Kansas City, Missouri	PCB solids (capacitors)	Non-thermal	Mechanical shredding	Demonstration complete Aug 1981	Approval granted Feb. 17, 1982.
Alcola Corp.	June 1981	Davenport, Iowa	PCB contaminated fuel oil (2.5 million gal) between 50-500 ppm PCBs	Thermal	Incineration in aluminum melting furnace	Test burn conducted the week of July 27-31, 1981. Test results are available.	Approved Dec. 1981.
Rose Chemical Co. (PCB Division)	June 1981	Holden, Missouri	PCB contaminated mineral oils up to 10,000 ppm, PCBs	Chemical	Dechlorination	Bench scale tests were successful. Full scale tests conducted in July 1982	Final approval granted March 1983.
Rose Chemical Co.	November 1982	Holden, Missouri	PCB capacitors	Mechanical	Shredding and rinsing	Demonstration conducted December 1982	Interim approval granted effective April 1 through October 1, 1983
PPM Incorporated	October 1981	Mobile	PCB contaminated mineral oils up to 10,000 ppm PCBs.	Chemical	Dechlorination	Full scale demonstration tests completed in Nov. 1981. Results are available.	Final approval granted August 1982. Approval was modified to allow treatment of PCB contaminated kerosene and heat transfer fluids.
Pyro-Magnetics	November 1981	Mobile	PCB contaminated waste oil (50% PCB concentration).	Thermal	Incineration	1st pilot burn conducted Dec. 9, 1981, Tallahoma, TN in Region IV. 2nd pilot burn conducted March 5, 1982.	Final approval granted September 1, 1982.

(continued)

TABLE 7. (Continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
Environmental International Inc.	January 1982	Mobile	PCB Contaminated waste oil.	Chemical	Detchlorination	Full scale demonstration was conducted on Jan. 14, 1982. Results show PCB concentration reduced from 570,000 ppm to less than 2 ppm. Test burn conducted on May 17, 1982.	Final approval granted January 1983.
Union Electric Company	April 1982	St. Louis, Missouri	PCB contaminated mineral oil up to 50,000 ppm PCBs.	Thermal	High efficiency boiler	Test burn conducted on May 17, 1982.	Final approval granted January 1983.
Transforming Consultants, Division of S.B. Myers	June 1982	Mobile	PCB liquids	Chemical	Detchlorination	Test conducted in Region V April 1982.	Interim approval granted from Oct. 1, 1982 to April 1, 1983 to treat PCB liquids up to 10,000 ppm PCBs.
PCB Treatment Incorporated	August 1982	Kansas City, Missouri	PCB liquids	Chemical	Detchlorination	Demonstration tests conducted September 8, 1982.	Approval granted November 30, 1982.
PCB Treatment Incorporated	January 1983	Kansas City, Missouri	PCB capacitors	Mechanical	Shredding & rinsing	Demonstration conducted Feb. 20, 1983.	Under review.
PCB Fractionation Research Laboratory	October 1982	Mobile	PCB contaminated dielectric mineral oil	Chemical	Detchlorination	Test conducted April 1982 in Region III.	Under preliminary review.
General Electric	October 1982	Mobile	PCB contaminated dielectric mineral oil	Chemical	Detchlorination	Pilot scale demonstration successfully conducted May 14, 1982 on 1050 ppm waste in Region III.	Interim approval granted March 1983.
PCB Specialist	-	Kansas City, Missouri	Mineral oil dielectric fluid	Chemical	Detchlorination	Tests are not scheduled at this time.	Informal letter of intent submitted October 21, 1982.
SED Incorporated	November 1982	Mobile	PCB contaminated capacitors	Mechanical	Shredding and rinsing of capacitors	No tests are scheduled at this time.	Under preliminary review.
Landfills	January 1980	Kansas City, Missouri	Contaminated dredge soil from 251 ppm to 0.02 ppm PCB concentration.	Landfills	-	Site plan available and acceptable to EPA Region VII since March 1982.	Conditional approval granted in July 1981. Project has been held up for lack of funds (no change in status since March 1982).
Alcola Corp.	October 1982	Davenport, Iowa	PCB contaminated sediment from surfactant impoundment facility under 500 ppm PCBs	Landfills	Contaminated disposal	-	Under final review.

TABLE 8. INFORMATION ON PCB ACTIVITIES - REGION VIII

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal Destruction</u>							
Rockwell International and Department of Energy	March 1980	Commercial Mobil Unit	PCB contaminated liquids	Thermal	Fluidized bed incineration	Test burn complete May 19, 1981 (test done in Rock Flats nuclear weapon plant) test burn results are available	Evaluation complete. No action on this permit is necessary. Results are acceptable. (PCB destruction efficiency 99.9999)
Acurex	March 1981	Mobile	PCB liquids up to 1000 ppm	Chemical	Dechlorination	Demonstration test complete (Sep. 9, 1981) Results are available.	Permit was granted on January 12, 1982, for up to 1000 ppm PCBs. Permission to treat up to 7,500 ppm PCBs granted September 1982.
T&R Electric	June 1981	Coloman, South Dakota	PCB liquids up to 500 ppm	Chemical	Dechlorination	Ongoing testing program.	Final approval granted September 1, 1982.
PCB Eliminators Inc.	September 1981	Mobile	PCB contaminated liquids	Chemical	Detoxification	Bench scale tests conducted in Region VII were successful. Full scale tests not yet planned.	Prototype bench scale operation. Will be converted into a full-scale commercial mobile unit at a later date. No change in status since March 1982.
SUNOHIO	October 1981	Mobile	PCB liquids up to 1000 ppm	Chemical	Dechlorination	Tests completed Nov. 1980 (test results are available)	Permit was granted on Jan. 29, 1982. Request to amend the permit to treat PCB liquids up to 2500 ppm was granted in September 1982.
Pyro-Magnetics Corporation	November 1981	Mobile	PCB liquids up to 41% by weight PCBs	Thermal	Incineration	1st pilot burn conducted Dec. 9, 1981, Tullahoma, TN in Region IV. 2nd pilot burn conducted March 5, 1982. Test results are available.	Permit was granted on September 12, 1982 to treat PCB liquids up to 41% PCB by weight.
PPM Incorporated	December 1981	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	Demonstration tests were completed Nov. 1981 in Region VII	Permit granted (March 25, 1982) to process PCB liquids up to 1000 ppm PCBs.

(continued)

TABLE 8. (Continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal Destruction</u>							
PCB Destruction Company	December 1981	Mobile	PCB liquids PCB concentration unknown at this time	Chemical	Dechlorination	First demonstration tests were conducted in Region VII on Dec. 18, 1981. Second tests were conducted on March 25, 1982 in Region VII.	Under review. First demonstration tests were unsuccessful. Awaiting second test results from Region VII.
Environmental International Incorporated	January 1982	Mobile	PCB liquids	Chemical	Dechlorination	Full scale demonstration was conducted on Jan. 14, 1982 in Region VII. Results show PCB concentration reduced from 570 ppm to 2 ppm.	Permit granted (March 25, 1982) to process PCB liquids up to 1000 ppm PCBs.
Transformer Consultants	April 1982	Akron, Ohio	PCB contaminated waste oil up to 2000 ppm PCBs.	Chemical	Detoxification	Test conducted on April 13-14 1982 in EPA Region V. About 300 gallons of oil containing 2000 ppm PCBs were treated during the tests. Test results are available.	Permit granted July 30, 1982.
PCB Specialist	October 1982	Mobile	Mineral oil dielectric fluid	Chemical	Dechlorination	Demonstration tests will be conducted in EPA Region VII.	Under preliminary review.
Franklin Institute Research Laboratory	October 1982	Mobile	Mineral oil dielectric fluid up to 7500 ppm PCBs	Chemical	Dechlorination	Pilot scale demonstration successfully conducted April 2, 1982 in Region III.	Permit granted February 1983 for fluids up to 7,500 ppm PCBs.
General Electric	November 1982	Mobile	Mineral oil dielectric fluid up to 1000 ppm PCBs	Chemical	Dechlorination	Pilot scale demonstration successfully conducted May 14, 1982 in Region III.	Permit granted February 1983 for fluids up to 1000 ppm PCBs.

Landfills

No landfills approved for PCB disposal in EPA Region VIII.

TABLE 9. INFORMATION ON PCB ACTIVITIES - REGION IX

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal Destruction</u>							
SUNOHIO	June 1980	Mobile	Dielectric mineral oils up to 1000 ppm, PCBs	Chemical	Dechlorination	Test complete Nov. 1980. Test results are available.	Final approval granted Dec. 1981.
Dow Chemical	September 1980	Pittsburg, California	Process waste (PCB contaminated waste)	Thermal	Incineration	Test completed Jan. 1983, results not available	Under review.
Acurex	January 1982	Mobile	PCB contaminated mineral oil up to 7500 ppm PCBs	Chemical	Dechlorination	Demonstrated nationally on September 9, 1982. Test results are available.	Permit granted August 22, 1982.
Thagard Research Corporation	July 1981	Irvine, California	PCB contaminated solids	Thermal	High temperature fluid volume reactor	Research and development ongoing tests	R&D permit granted June 7, 1982 to treat soil contaminated with high concentrations of PCBs.
Rockwell International	October 1981	Ventura County, California	PCB oils no limit specified	Thermal	Molten salt reactor process	Not planned.	Research permit granted January 26, 1982.

(continued)

TABLE 9. (Continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal Destruction</u>							
Pyro-Magnetics Corporation	November 1981	Mobile	PCB Contaminated waste oils	Thermal	Incineration	1st pilot burn conducted Dec. 9, 1981, Tullahoma, TN in Region IV. 2nd pilot burn conducted March 5, 1982. Test results are available.	Final phase of approval. Draft approval is being reviewed by the states. Public comment period is closed. Region IX is evaluating public comments received and awaiting results of health risk assessment by California Department of Health Services.
Transformer Consultants	April 1982	Mobile	Transformer oils	Chemical	Dechlorination	Demonstration tests conducted in Region V; April 1982. Test results are available.	Under review. Draft approval is being prepared. Additional information requested.
Saird Corporation	May 1982	Irvine, California	PCB contaminated solids	Thermal	High temperature fluid volume reactor.	Research and development on going tests.	R&D permit granted June 21, 1982, to treat sediment up to 10,000 ppm PCBs.
Franklin Institute Research Laboratory	October 1982	Mobile	PCB contaminated dielectric mineral oil	Chemical	Dechlorination	Test conducted April 1982 in Region III	Under review. Additional information requested.
General Electric	October 1982	Mobile	PCB contaminated dielectric mineral oil	Chemical	Dechlorination	Pilot scale demonstration successfully conducted May 14, 1982 in Region III on wastes containing 1050 ppm PCBs.	Under review. Additional information requested.
<u>Landfills</u>							
Chemical Waste Management, Inc.	October 1980	Kettleman Hills, California	PCB solids	Landfill	-	-	Usage approved. Company request for additional acreage granted February 16, 1983.
U.S. Ecology	November 1981	Beatty, Nevada	PCB solids only	Landfill	-	-	Usage approved October 27, 1982.

TABLE 10. INFORMATION ON PCB ACTIVITIES - REGION X

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
<u>Thermal and nonthermal Destruction</u>							
SUNOHIO	August 1980	Mobile	Dielectric mineral oil up to 1500 ppm PCBs	Chemical	Dechlorination	Demonstrated nationally 10/24/80.	Approval granted Jan. 21, 1982 to treat mineral oil dielectric fluids up to 1500 ppm PCBs. Approval for fluids up to 2500 ppm PCBs granted October 1982.
Washington Water and Power Company	October 1980	Spokane, Washington	Dielectric mineral oils below 500 ppm	Thermal	High efficiency boiler	Burn took place for 36 hours in Dec. 1981.	Approved December 1981.
ACUREX	January 1981	Mobile	Dielectric mineral oils	Chemical	Dechlorination	Demonstration test complete Sept. 9, 1981.	Approved April 19, 1982 for mineral oil dielectric fluids with 1500 ppm PCBs. Increased to allow treatment of oil up to 7500 ppm PCBs in Dec. 1982.
Environmental International Inc.	September 1981	Mobile	Capacitors	Chemical	Capacitor disposal technology	Full scale demonstration was conducted on Jan. 14, 1982 in Region VII. Test results are available.	Final stage of approval
PPM Incorporated	September 1981	Overland Park, Kansas	Dielectric mineral oils below 500 ppm	Chemical	Dechlorination	Demonstration test conducted Nov 1981 in EPA Region VII. Results are available.	Approval granted July 1982, will expire Jan. 1, 1985. Modified to include kerosene as well as dielectric mineral oils up to 1500 ppm PCBs in November 1982.
Pyro-Magnetics	November 1981	Mobile	PCB Contaminated waste oil up to 41.7% by weight PCBs	Thermal	Incineration	1st pilot burn conducted Dec. 9, 1981, Tulsa, TN in Region IV. 2nd pilot burn conducted March 5, 1982. Test results are available.	Under review. Final phase of approval. Public comment period ended December 19, 1982.
PCB Destruction Company	December 1981	Mobile	PCB contaminated waste oil.	Chemical	Dechlorination	First tests were conducted in Region VII on Dec. 18, 1981.	Under review. Awaiting second test results from Region VII.
Environmental International Inc.	February 1982	Mobile	PCB contaminated waste oil	Chemical	Dechlorination	Full scale demonstration was conducted on January 14, 1982 in Region VII. Test results are avail.	Under review. Draft letter of approval is complete.

(continued)

TABLE 10. (Continued)

Company	Application Date	Site Location	Type of Waste	Disposal Method	Process Utilized	Demonstration Plan or Burn	Status
Transformer Consultants	April 1982	Akron, Ohio	PCB contaminated dielectric mineral oil.	Chemical	Dechlorination	Test run conducted in Region V, April 14-15, 1982.	Approved December 8, 1982, for wastes up to 2100 ppm PCB.
Franklin Institute Research Laboratory	October 1982	Mobile	PCB contaminated dielectric mineral oil up to 7406 ppm PCBs	Chemical	Dechlorination (Na PEG process)	Test conducted April 1982 on 7406 ppm waste in Region III.	Final phase of approval. Draft approval letter is ready. Test results are available. Public notice period ends March 31, 1983.
General Electric	October 1982	Mobile	PCB contaminated dielectric mineral oil	Chemical	Dechlorination	Pilot scale tests successfully conducted May 14, 1982 in Region III on waste containing 1050 ppm PCBs.	Final phase of approval. Draft approval letter being planned. Test results are available. Public notice published March 21, 1983.
Aqua-Tech	October 1982	Hillsboro, Oregon	Oily waste contaminated with PCBs up to 100 ppm.	Bio-degradation		Research and development ongoing tests.	Under preliminary review.
SED Incorporated	November 1982	Mobile	PCB contaminated capacitors	Mechanical	Shredding and rinsing of capacitors	Demonstration test not scheduled at this time.	Under preliminary review.
PCB Specialist	-	Mobile	PCB contaminated dielectric mineral oil	Chemical	Dechlorination	Demonstration test will be conducted in Region VII	Letter of Intent submitted March 1983.
Landfills							
Envirosafe Services of Idaho, Inc.	February 1977	Grandview, Idaho	All waste permitted under regulations	Landfill		Site plan complete, inspection complete.	Approval renewal granted March 5, 1982.
Chemical Security Systems, Incorporated	February 1977	Arlington, Oregon	All waste permitted under regulations	Landfill		Site plan complete, inspection complete.	Approval renewal granted March 25, 1983
Washington Waste Treatment Inc.	July 1982	Batum, Washington	All waste permitted under regulations	Landfill		Initial application review completed.	Under review.

TABLE 11. EPA REGIONAL OFFICE AND TECHNICAL ASSISTANCE CONTACTS AT REGIONS I - X

Region/Address	Contact*	Division	Telephone No.	Region/Address	Contact*	Division	Telephone No.
U.S. EPA, Region I John F. Kennedy Bldg. Room 2303 Boston, MA 02203	Chuck Lincoln	Air Management	(617) 223-7740	U.S. EPA, Region VI 1201 Elm Street Dallas, TX 75270	Jim Sales Regional PCB Coordinator	Technical Section Air & Waste Management Division	(214) 767-8941
	Paul Heffernan	Air & Hazardous Materials	(617) 223-0585		Martin Allen	Technical Section Air & Waste Management Division	(214) 767-8941
	Tom Michel	Enforcement	(617) 223-5610		Larry Thomas Regional Toxic Coordinator	Pesticides & Toxic Substances Branch	(214) 767-2734
U.S. EPA, Region II Federal Office Bldg. 26 Federal Plaza New York, NY 10007	John Brogard	Air & Waste Mgmt.	(212) 264-2637	U.S. EPA, Region VII 324 East 11th Street Kansas City, MI 64106	Phil Schwindt	Environmental Services Division	(214) 767-2727
	Jerry McKenna	Surveillance & Analysis	(212) 321-6645		Steve Busch	Permit. Waste Management Branch	(816) 374-6531
	Herman Phillips	Public Awareness	(212) 264-2515		Marvin Frye Regional PCB Coordinator	Toxic & Pesticides Section	(816) 374-3036
	Arthur H. Gevirtz	Env. Services	(201) 321-6667	U.S. EPA, Regions VIII 1860 Lincoln Street Denver, CO 80203	Steve Farrow Regional PCB Coordinator	Toxic Substances Branch	(303) 837-3926
U.S. EPA, Region III Curtis Building Sixth & Walnut Streets Philadelphia, PA 19106	Daniel Kraft	Env. Services	(201) 321-6667		Dean Gilliam Regional Toxic Coordinator	Toxic Substances Branch	(303) 837-3926
	Edward Cohen	Environmental Services	(215) 597-7668	U.S. EPA, Regions IX 216 Fremont Street San Francisco, CA 94105	Raymond Seid	Toxic and Waste Management Branch	(415) 974-8389
	Christopher Pilla	Environmental Services	(215) 597-4651		Jim Suhrer	Office of Technical & Scientific Assistance	(415) 974-8192
	Michael Vaccaro	Regional Council	(215) 597-9477	U.S. EPA, Region X 1200 6th Avenue Seattle, WA 98101	Charles W. Rice	Waste Management Branch	(206) 442-2728
U.S. EPA, Region IV 345 Courtland, NE Atlanta, GA 30365	K. K. Wu	Environmental Services	(215) 597-7683		Roger Fuentes Regional PCB Coordinator	Waste Management Branch	(206) 442-1254
	Don Hunter	Waste Management	(404) 881-3933		Jim Everts Regional Toxic Coordinator	Permits & Compliance Branch	(206) 442-1090
	Ralph Jennings	Regional Toxics & PCB Coordinator	(404) 881-3864				
	Howard Zeller	Enforcement	(404) 881-2211				
	Constance Allison	Air & Waste Management	(404) 881-3864				
U.S. EPA, Region V 230 S. Dearborn St. Chicago, IL 60604	James Finger	Surveillance & Analysis	(404) 546-3136				
	Francis Redman	Public Awareness	(404) 881-3004				
U.S. EPA, Region VI 230 S. Dearborn St. Chicago, IL 60604	Y. J. Kim	Waste Management	(312) 353-1428				
	Bill Hino	Waste Management	(312) 886-6136				

For Technical assistance and review of disposal technology please contact:

U.S. EPA, Region I-V
GCA Corporation, Bedford, MA
Bob McInnes (617) 275-5444 Ex 4206

U.S. EPA, Region VI-X
TRW Energy and Environmental Division, Torrance, CA
Bob Johnson (213) 536-3894
Don Ackerman (213) 535-6531

* The first contact listed for each Region is the primary contact for information contained in this report.

APPENDIX A

Region VI - Jim Sales --

Energy System Company's (ENSCO) application to incinerate PCB contaminated solid waste was approved on February 7, 1983. ENSCO also applied for a permit to reclaim PCB drums on March 17, 1983.

A draft approval was issued on March 18, 1983 to Volcan Material Company for incineration of vinyl chloride process waste. Final decision on this permit is in process.

Approval was granted to Rollins Environmental Services, Deer Park, Texas, during January of 1983 for incineration of PCB contaminated solid waste. Results of test burns and a public hearing were satisfactory.

A trial burn is scheduled by PPG for incineration of process waste stream at their facility in Lake Charles, Louisiana. PPG's permit application is under preliminary review.

Approval was granted to Acurex to increase the maximum content of PCBs from 2100 ppm to 7500 ppm for treatment by their mobile dechlorination unit.

PPM, Inc. received approval on March 7, 1983 for chemical dechlorination of PCB contaminated mineral oil in a mobile unit.

Results have been received for a test burn conducted by Los Alamos Scientific Laboratories. This incineration permit application is currently being reviewed by Region VI.

Transformer Consultants' application for a permit to chemically dechlorinate PCB contaminated mineral oil was approved on March 7, 1983. Mobile dechlorination units of General Electric Company and Franklin Institute Research Laboratory were also approved on March 7 by Region VI.

Huber Corporation, Bolger, Texas, submitted an application for permit during December 1982 for pyrolytic decontamination of soil containing PCBs. A pilot scale test is scheduled for May 1983.

A permit application for biological treatment of PCB sludges was requested in January 1983 by Biotechnology, Inc., Houston, Texas. A research project is underway, and a demonstration is not planned at this time. This application is under preliminary review by Region VI.

The closure plan for the Lipsitz landfill at Waco, Texas, has been completed. A cleanup order has been sent out for signatures.

Region VII - Steve Busch --

Final approval was granted during March of 1983 to Rose Chemical Co., PCB Division, for chemical dechlorination of PCB contaminated mineral oils containing up to 10,000 ppm of PCBs. Rose Chemical has also applied, during November of 1982, for a permit to decontaminate PCB capacitors by a shredding and rinsing process. A demonstration of the process was conducted in December of 1982. Interim approval was granted effective April 1 through October 1, 1983.

Test results indicated satisfactory destruction of PCB contaminated mineral oil in a high efficiency boiler by Union Electric Company. Final approval was granted during January 1983 for disposal of oil containing up to 50,000 ppm PCBs.

PCB Treatment Incorporated of Kansas City, Missouri, was granted approval on November 30, 1982 for disposal of PCB liquids by chemical dechlorination. An application filed during January 1983 by this company for decontamination of PCB capacitors by shredding and rinsing is currently under review. A demonstration test was performed on February 28, 1982.

Interim approval was granted to General Electric Company during March 1983 for chemical dechlorination of PCB contaminated dielectric mineral oil by a mobile unit.

PCB Specialist submitted an informal letter of intent on October 21, 1982 for a chemical dechlorination process. Tests are not scheduled at this time.

There has been no change in the status of landfill applications in Region VII, as shown in Table 7.

Region VIII - Steve Farrow --

Acurex was granted approval during September of 1983 to treat liquids up to 7500 ppm of PCBs. This is an increase from the 1000 ppm maximum PCB concentration previously allowed since January 12, 1982.

A permit was granted during February 1983 to the Franklin Institute Research Laboratory to treat mineral oil dielectric fluid with up to 7500 ppm of PCBs. This permit is for a chemical dechlorination process demonstrated successfully in Region III on April 2, 1982.

General Electric Company's mobile dechlorination unit was approved for processing up to 1000 ppm PCBs in mineral oil dielectric fluid. This permit was granted during February of 1982.

Region IX - Raymond Seid --

A trial burn was completed during January 1983 at Dow Chemical's Pittsburg, California, incineration facility. Results of this test are not yet available, and the permit application remains under review.

The Pyro-Magnetics Corporation mobile incinerator permit is in the final approval phase. Public comments are being reviewed by Region IX and a health risk assessment is being performed by the State of California Department of Health Services.

Additional information has been requested by the Region IX from Transformer Consultants, Franklin Institute Research Laboratory and General Electric Company to aid in review of their permit applications. Each of these companies has completed demonstration tests of chemical dechlorination of transformer fluids containing PCBs.

A request for additional acreage to landfill PCB solids was granted to Chemical Waste Management, Inc. on February 16, 1983. This site is located at Kettleman Hills, California.

Region X - Charles Rice --

The SUNOHIO mobile chemical dechlorination unit permit was modified during October 1982 to allow treatment of up to 2500 ppm of PCBs in mineral oil dielectric fluids. The previous limit was 1500 ppm PCBs.

Approval was granted to Acurex in December 1982 to increase the maximum PCB content from 1500 ppm to 7500 ppm for dielectric mineral oils treated by their mobile dechlorination unit.

PPM Incorporated's permit to chemically dechlorinate dielectric mineral oils was modified in November 1982 to include kerosene as well. This permit modification also increased the PCB concentration limit from 500 ppm to 1500 ppm.

The public comment period on Pyro-Magnetics' permit application for a mobile incinerator ended December 19, 1982. This permit is in the final phase of approval.

Transformer Consultants' permit application was approved on December 8, 1982 for chemical dechlorination of dielectric mineral oil with up to 2100 ppm PCBs.

PCB Specialist submitted a letter of interest during March 1983 to Region X for chemical dechlorination process for PCB contaminated dielectric mineral oil. Demonstration tests will be conducted in Region VII.

A landfill permit was requested by Washington Waste Treatment, Inc. in July of 1982. Initial application review has been completed by Region X for this site, located in Batum, Washington.

PCB Checklist - PCB Classification, Marking, Authorization/Inspections,
Servicing, Storage for Disposal, Records and Monitoring - 40 CFR Part 761

Classification of PCB Items, Articles, Containers, Equipment, Capacitors, and
Transformers [761.3]

- ___ Consider capacitors containing < 1.38 Kg (3 lbs) of dielectric fluid as "small capacitors" [761.3(d)(1)].
- ___ Consider capacitors containing ≥ 1.36 Kg (3 lbs) of dielectric fluid and which operate at $> 2,000$ volts a.c. as "Large High Voltage Capacitors" [761.3(d)(2)].
- ___ Consider capacitors containing ≥ 1.36 Kg (3 lbs) of dielectric fluid and which operate $< 2,000$ volts a.c. as "Large Low Voltage Capacitors" [761.3(d)(3)].
- ___ Consider devices that electrically control fluorescent light fixtures and that include a capacitor containing ≤ 0.1 kg of electric as "Fluorescent Light Ballast." [761.3(j)].
- ___ Consider any manufactured article, other than a PCB container, that contains PCBs and whose surface has been in direct contact with PCBs as a "PCB Article." [761.3(+)].
- ___ Consider and package, can, bottle, bag, barrel, drum, tank, etc., that contains PCBs and whose surface has not been in direct contact with PCBs as a "PCB Container" [761.3(u)].

- ___ Consider any manufactured item, other than PCB article containers, which contains a PCB article or other equipment, as "PCB Equipment" [761.3(v)].
- ___ Consider any PCB articles, article containers, and containers that contain PCBs at concentrations of >50 ppm as a "PCB Item" [761.3(x)].
- ___ Consider any transformer containing PCBs at concentrations of >500 ppm as a "PCB Transformer" [761.3(y)].
- ___ Consider any transformer containing PCBs at concentrations of 50 to 500 ppm as "PCB-contaminated Transformers" [761.3(z)].

Servicing Transformers - 761.30(a)

- ___ After 10/1/85 use and storage for reuse of PCB Transformers that pose a risk to food or feed is prohibited [761.30(a)(i)].
- ___ Visual inspection of PCB transformers performed every 3 months [761.30(a)(1)(ii)].
- ___ Minimum of 30 days between inspections [761.30(a)(1)(ii)].
- ___ Inspection for leaks of dielectric fluid on or around transformer [761.30(a)(1)(ii)].

- ___ Repair/replace leaking transformer to eliminate source of leak [761.30(a)(1)(iii)].
- ___ Clean-up leaked material and dispose of in accordance with 761.60 [761.30(a)(1)(iii)].
- ___ Contain active leaks to prevent exposure to humans and the environment [761.30(a)(1)(iii)].
- ___ Inspect active leaks daily to verify containment [761.30(a)(1)(iii)].
- ___ Use trenches, dikes, buckets, pans, or like equipment for containment of active leaks [761.30(a)(1)(iii)].
- ___ Records of inspection and maintenance history kept for 3 years after disposing of PCB transformers [761.30(a)(1)(iv)].

Records shall contain the following information about the transformer [761.30(a)(iv)(A-H)]:

- ___ Location
- ___ Date of each visual inspection
- ___ Person performing inspection
- ___ Leak location
- ___ Estimate of the amount of leaked material
- ___ Date of repair, clean-up, etc., performed

- ___ Results of any containment and daily inspections required for active leaks.

Reduced frequency inspections 761.30(a)(v)(A) and (B)

- ___ Yearly inspections of PCB transformers with impervious, undrained, secondary containment with a capacity of 100% of the total volume of dielectric fluids, or
- ___ Yearly inspections for PCB transformers tested and found to contain between 500 ppm and <60,000 ppm after 3 months of inservice use (must know exact concentration).

Increased visual inspections 761.30(a)(iv)

- ___ PCB transformers posing exposure risk to food/feed must be inspected once per week.

Transformers proximate to food and feed 761.30(a)(1)

- ___ No use or storage for reuse of PCB transformers posing an exposure risk to food or feed after 10/1/85.

Servicing transformers 761.30(a)(2)

- ___ Only <500 ppm PCB fluids may be used to service PCB Contaminated Transformers [761.30(a)(2)(i)].

- ___ No servicing of PCB transformers requiring coil removal [761.30(a)(2)(ii)].

- ___ Removed PCBs during servicing (rebuilding must be either reused as dielectric fluid or disposed in accordance with 761.60. No addition of PCBs from PCB Transformers to dielectric fluids in PCB Contaminated Transformers [761.30(a)(2)(iii)].

- ___ No use of dielectric fluids containing less than 500 ppm mixed with fluids of 500 ppm or greater [761.30(A)(2)(iv)].

- ___ PCB Transformer may be converted to a non-PCB Transformer and a PCB-Contaminated Electrical Equipment may be reclassified to a non-PCB Transformer by draining, refilling, or otherwise servicing. Reclassification can be accomplished if:
 - ___ Dielectric fluid is <500 ppm PCB for PCB-contaminated Electrical Equipment

 - ___ Dielectric fluid is <500 ppm PCB for non-PCB Transformer after at least 3 months of servicing and use

 - ___ All removed PCBs must be disposed of in accordance with 761.60 [761.30(a)(2)(v)].

 - ___ All dielectric fluid containing PCB of >50 ppm used for servicing must be stored in accordance with 761.65 [761.30(a)(2)(v)].

Use and Servicing of Railroad Transformers - 761.30(b)

- ___ Must be performed in accordance with 761.30(b).

Use and Servicing of Mining Equipment - 761.30(c)

- ___ Must be performed in accordance with 761.30(c).

Use in Heat Transfer Systems - 761.30(d)

- ___ No use of PCBs in non-totally enclosed manner in heat transfer systems after July 1, 1984 [761.30(d)].
- ___ Use in non-totally enclosed manner in heat transfer systems allowed under the following conditions prior to July 1, 1984.
 - ___ Testing of all heat transfer systems that ever contained PCBs for PCB concentration by November 1, 1979 and on a yearly basis [761.30(d)(1)].
 - ___ Testing performed at least 3 months after most recent fluid refilling [761.30(d)(1)].
 - ___ No testing necessary when PCB concentrations are less than 50 ppm [761.30(d)(1)].

___ Within 6 months of testing that show PCB concentrations of >50 ppm, the system must be drained and refilled with PCBs of <50 ppm [761.30(d)(2)].

___ No addition of PCBs to heat transfer systems [761.30(d)(4)].

___ Must keep above obtained data for 5 years after the heat transfer system reaches 50 ppm PCBs [761.30(d)(5)].

Use in Hydraulic Systems - 761.30(e)

___ No use of PCBs in non-totally enclosed manner in hydraulic systems after July 1, 1984 [761.30(e)].

___ Use in non-totally enclosed manner in hydraulic systems allowed under the following conditions prior to July 1, 1984 [761.30(e)]:

___ Testing of all hydraulic systems that ever contained PCBs for PCB concentrations by November 1, 1979 and on a yearly basis [761.30(e)(1)].

___ Testing performed at least 3 months after most recent fluid refilling [761.30(e)(1)].

___ No testing necessary when PCB concentrations are less than 50 ppm [761.30(e)(2)].

___ Within 6 months of testing that show PCB concentrations of >500 ppm, the system must be drained and refilled with PCBs of <500 ppm [761.30(e)(2)].

___ No addition of PCBs to hydraulic systems [761.30(e)(3)].

___ Must keep above obtained data for 5 years after the hydraulic system reaches 50 ppm PCBs [761.30(e)(6)].

Use in Carbonless Copy Paper - 761.30(f)

___ Must be performed in accordance with 761.30(f).

Pigments

___ Must be performed in accordance with 761.30(g).

Use and Servicing Electromagnets, Switches, and Voltage Regulators - 761.30(h)

___ No use and storage for reuse of electromagnets containing PCBs >500 ppm that pose a risk to food or feed after October 1, 1985 [761.30)(h)(1)(i)].

___ Visual inspections must be performed weekly for above cited electromagnets in accordance with 761.30(a)(1)(iii) and (iv) [761.30(h)(1)(ii)].

- ___ Servicing of electromagnets, switches, and voltage regulators with PCBs of >500 ppm requiring removal or rework of internal components is prohibited [761.30(h)(2)(ii)].

- ___ PCB contaminated electrical equipment must only be serviced with dielectric fluid <500 ppm PCBs [761.30(h)(2)(ii)].

- ___ Removed PCB must either be reused as dielectric fluid or disposed of in accordance with 761.60 [761.30(h)(2)(iii)].

- ___ No mixing or adding of >500 ppm PCBs to dielectric fluids from PCB-contaminated Electrical Equipment [761.30(h)(2)(iv)].

- ___ No use of mixtures of <500 ppm PCB dielectric fluids and >500 ppm PCB dielectric fluids in any electrical equipment.

- ___ Electromagnets, switches, and voltage regulators with PCBs of >500 ppm may be converted to PCB-Contaminated Electrical Equipment or non-PCB classification and PCB-Contaminated Electrical Equipment may be reclassified to a non-PCB classification by draining, refilling, and/or otherwise servicing the equipment. Reclassification can be accomplished if:
 - ___ Dielectric fluid is <500 ppm PCB for PCB-Contaminated Electrical Equipment .

___ Dielectric fluid is <50 ppm PCB for non-PCB classification after at least 3 months of servicing and use [761.30(h)(2)(v)].

___ All PCBs of >50 ppm removed from the equipment are subject to disposal requirements specified in 761.60 [761.30(h)(2)(v)].

___ Dielectric fluid containing >50 ppm PCBs used for servicing must be stored as specified in 761.65 [761.30(h)(2)(vi)].

Use in Natural Gas Pipeline - 761.30(i)

___ Must be performed in accordance with 761.30(i).

Small Quantities for R&D - 761.30(j)

___ No use of small quantities in non-totally enclosed manner after July 1, 1984 [761.30(j)].

___ Use of small quantities after July 1, 1979 requires TSCA exemption [761.30(j)].

Microscopy Mounting Medium - 761.30(k)

___ Must be performed in accordance with 761.30(k).

Use in Capacitors - 761.30(1)

___ No use and storage for reuse PCB Large High Voltage Capacitors and PCB Large Low Voltage Capacitors posing an exposure risk to food and feed after 10/1/88 [761.30(1)(1)(i)].

___ Use of above equipment after 10/1/88 is restricted to use within a restricted-access electrical substation or in a contained and restricted-access indoor installation [761.30(4)(1)(ii)].

Use in and Servicing Circuit Breakers, Reclosers, and Cable - 761.30(m)

___ Only use of <50 ppm PCB dielectric fluids for servicing [761.30(m)(1)(i)].

___ Those found to contain >50 ppm may only be serviced according to 761.30(h)(2) [761.30(m)(1)(ii)].

Marking of PCBs - 761.40

Markings specified in 761.45(a) or (b) required for (761.50(a)(1)-(10) and (b)(d)(e)(f)(g) and (h)):

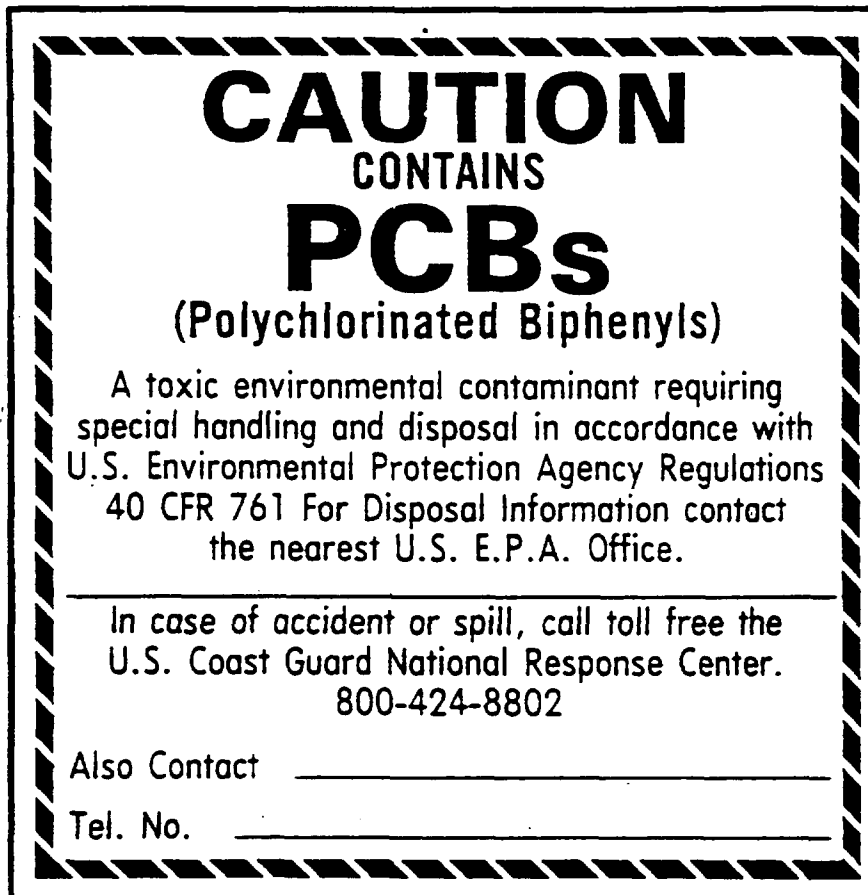
___ PCB Containers.

___ PCB Transformers (excluding PCB-Contaminated Transformers)

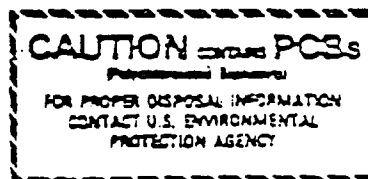
- ☐ PCB Large High Voltage Capacitors (expect when one or more are installed in a protected location--power pole, building, behind a fence--and the protecting structure is marked.)
- ☐ Equipment containing PCB Transformers and/or PCB Large High Voltage Capacitors.
- ☐ PCB Large Low Voltage Capacitors at the time of removal from use.
- ☐ Electric motors containing PCB coolants.
- ☐ Heat transfer systems using PCB hydraulic fluids.
- ☐ Heat transfer systems using PCBs.
- ☐ PCB Article Containers containers articles or equipment cited above.
- ☐ Each storage area used to store PCBs and PCB items for disposal.
- ☐ Transport vehicles loaded with PCB containers that contain more than 45 Kg (99.4 lbs) of liquid PCBs or with one or more PCB Transformers.
- ☐ PCB Equipment containing a PCB Small Capacitor.
- ☐ Hydraulic systems using PCBs with concentrations of 50 to 500 ppm.
- ☐ Heat transfer systems using PCBs with concentrations of 50 to 500 ppm.

Required markings - 761.45(a) and (b)

— Where the piece is large enough, mark with the following:



— Where the above marking is too large, mark with the following:



— Large low voltage capacitors and small capacitors used in alternating current circuits and fluorescent light ballasts manufactured between 7/1/78 and 7/1/98 marked "No PCBs."

Disposal Requirements - 761.60(a)

— Storage of PCB Articles in accordance with 761.65 (761.60(a)(6)).

___ Spills, leaks, and other uncontrolled discharges of PCBs constitute disposal of PCBs [761.60(d)(1)].

___ PCBs resulting from the clean-up and removal of spills etc. must be stored in accordance with 761.60(a) [761.60(d)(2)].

Storage for Disposal - 761.65

___ PCB items stored for disposal prior to 1/1/83 shall be removed and disposed of by 1/1/84 [761.65(a)].

___ PCB items placed in storage for disposal shall be removed within 1 year of storage date [761.65(a)].

Storage facility requirements - 761.65(b)(1)(i)-(v):

___ Roof and walls to prevent rain water from reaching PCBs and PCB items.

___ Floor with continuous 6 inch curbing.

___ Secondary containment of at least 200% of the largest PCB article/PCB container, or 25% of the total internal volume of all PCB articles or PCB containers, whichever is greater.

___ Floor/curbs shall not have drain valves, floor drains, expansion joints, sewer lines, etc. that permit liquids to flow from the curbed area.

___ Floors constructed of impermeable material (e.g., portland cement, concrete, steel).

___ Area not located below the 100-year flood water elevation.

Temporary exemptions for storage of PCB items are allowed for the following -
761.65(c)(1)(ii)-(iv):

___ Stored no longer than 30 days, and

___ Notation attached to item with date of removal from service:

___ Non-leaking PCB articles and PCB equipment

___ Leaking PCB articles and PCB equipment that are placed in non-leaking containers with sufficient sorbants to absorb remaining PCB liquids in PCB items.

___ PCB containers containing non-liquid PCBs (soils, rags, debris, etc.).

___ PCB containers containing liquid PCBs at 50 to 500 ppm provided that SPCC plan has been prepared and containers have marking of PCB concentrations.

Storage of Non-leaking and Structurally Undamaged PCB Large High Voltage Capacitors and PCB-contaminated Electrical Equipment that have not been drained - 761.65(c)(2):

- ___ Must be stored next to above specified storage facility on pallets [761.65(c)(2)].
- ___ Storage of PCB-contaminated Electrical Equipment that have been drained are exempted from 761.65 [761.65(c)(2)].
- ___ Storage under 761.65(c)(2) allowed only for storage facilities with immediately available unfilled storage space of >10% of the volume of the capacitors and equipment outside of the facility [761.65(c)(2)].
- ___ Storage under 761.65(c)(2) allowed only if temporarily stored capacitors and equipment are inspected weekly [761.65(c)(2)].

General Storage Requirements - 761.65(c)(3-9)

- ___ Storage areas shall be marked according to 761.40
- ___ Moveable equipment used for handling PCBs and PCB items that come in contact with PCBs shall be decontaminated (per 761.79) prior to removal from storage facility
- ___ PCB Articles and PCB containers inspected for leaks every 30 days

- ___ Leaking PCB Articles and PCB Items shall be transferred immediately to properly marked non-leaking containers.
- ___ Spilled materials shall be cleaned up immediately using sorbants, etc.
- ___ Cleaned up PCB residues shall be disposed of in accordance with 761.60(a).
- ___ Storage containers used for containing PCB liquids shall comply with DOT 49 CFR 178.80, 178.82, or 178.115. Alternate oversize containers may be used if they provide as much protection against leakage and exposure to the environment and are as strong and durable.
- ___ Alternate oversize storage containers may be used for containing liquid PCBs if they are operated and constructed in compliance with OSHA 29 CFR 1910.106 and the effect of PCB liquid's specific gravity is assessed relative to container strength.
- ___ SPCC plan shall be prepared and implemented by owners/operators using oversize containers for PCB liquids.
- ___ PCB articles and PCB containers shall be dated when placed in storage.
- ___ PCB articles and PCB containers shall be stored such that they can be located by the date they entered storage.

___ Oversize containers for PCB articles and PCB items shall have a record that includes dates of batches added or removed from the container.

___ Establish and maintain records.

Decontamination - 761.79

___ PCB containers shall be decontaminated by triple rinsing using a solvent containing <50 ppm PCBs. The solubility of PCBs in the solvent shall be >5% or more by weight and the solvent rinse shall be 10% of the container capacity [761.79(a)].

___ Used solvents shall be disposed of as a PCB per 761.10(a). No liquid PCBs resulting from decontamination shall be disposed of per 761.10(a)(4) [761.79(a)].

___ Moveable equipment shall be decontaminated by swabbing the surfaces using the above specified solvent [761.79(b)].

Marking of PCB equipment 761.45

___ Mark items in accordance with 761.45.

___ Markings must be durable enough to equal or exceed the life of the PCB equipment (through the point of disposal of the equipment).

Records and Monitoring 761.80

- Maintain records on disposition of PCBs and PCB items when using or storing at one time:

- >45 Kg (99.4 lbs) of PCBs contained in PCB Containers.

- >1 PCB Transformers.

- >50 PCB Large High or Low Voltage Capacitors.

- Records shall be used as a basis for annual document prepared July 1.

- Records shall be maintained at facility.

- Records shall be maintained for 5 years after facility does not use or store PCB items.

Included information in document 761.80(a)(1):

- Dates when PCBs and PCB items are removed from service.

- Dates when PCBs and PCB items are placed in storage and disposal.

- Dates when PCBs and PCB items are placed in transport for disposal.

Quantities shall be indicated in the following breakdown 761.80(a)(1):

___ Total weight in kilograms of PCBs and PCB items in each PCB container.

___ Total number of PCB transformers and total weight of PCBs contained in transformers.

___ Total number of PCB Large High and Low Voltage Capacitors.

For PCBs and PCB items removed from service 761.80(a)(2)

___ Location of the initial storage/disposal facility.

___ Name of owner/operator of storage/disposal facility.

Quantities of PCB or PCB items in use at end of year shall be indicated in following breakdown 761.80(a)(3):

___ Total weight in kilograms of PCBs and PCB Items in each PCB Container and identification of contents.

___ Total number of PCB Transformers and total weight of PCBs contained in transformers.

___ Total number of PCB Large High or Low Voltage Capacitors.

Records and Monitoring for Storage Facilities - 761.80(b):

___ Prepare each July 1 for the previous calendar year records for PCBs and PCB Items handled at the facility.

___ Maintain the documents for >5 years after the facility is no longer used for storage.

___ Make documents available to EPA authorities.

___ Notify EPA within 60 days from time of closure that the facility is no longer used for storage. Specify where documents will be located.

Documents for Storage Facilities shall contain the following information [761.80(b)(1)-(4)]:

___ Date when PCBs and PCB Items were received at the facility.

___ Identification of the facility and owner from which PCBs and PCB Items were shipped .

___ Date when PCBs and PCB Items are transferred to another storage facility .

___ A summary of the total weight in kilograms of PCBs and PCB Articles in containers and the total weight of PCBs contained in PCB Transformers that have been handled during the previous year including the following information:

- ___ Received during the year.
- ___ Transferred to other facilities during the year.
- ___ Retained at the facility at the end of the year.
- ___ Contents of PCB containers .
- ___ Name of facility to which stored PCBs and PCB Items are transferred.

___ A summary of the total number of PCB Articles and PCB Equipment not in PCB Containers :

- ___ Received during the year.
- ___ Transferred to other facilities during the year.
- ___ Retained at the facility at the end of the year.
- ___ Identification of specific types of PCB Articles and PCB Equipment.
- ___ Name of the facility to which PCB Articles and Equipment are transferred.

Additional Special Records for Storage Facilities - 761.80(f)

___ Must maintain documents, correspondence, and data that have been provided to the owner/operator of the facility by any state, or local

government agency and that pertain to the storage or disposal of PCBs or PCB items.

— Must maintain all parallel documents provided by owner/operator to government agencies.

— Must maintain applications and related correspondence sent by owner/operator to facility to government agencies regarding waste/wastewater permits.